From: Mike Wieczorek [/O=ENVIRONCORP/OU=EXCHANGE ADMINISTRATIVE GROUP

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=MWIECZOREK]

**Sent**: 2/19/2015 5:42:56 PM

To: Kristen Willoughby (mailto:kwilloug@idem.IN.gov) [mailto:kwilloug@idem.IN.gov]

CC: Hussain, Munim [Munim.Hussain@mgpingredients.com]; Randy Graves (randy.graves@mgpingredients.com)

[randy.graves@mgpingredients.com]

BCC: Mikhil Shetty [mshetty@environcorp.com]

Subject: MGPI of Indiana SSM 029-35276-00005 / SPM 029-35318-00005; dryer baseline

Kristen,

To follow-up on our phone call, I've confirmed that the 24 month period used for establishing steam tube dryer baseline emissions is January 2013 – December 2014.

In Table D-8, footnote (a) should read the following for clarity:

Feed (wet cake) into existing steam tube dryer system is taken from facility records as the average over the 24-month period from January 2013 - December 2014.

It looks like what happened is that the excel row wasn't tall enough and truncated the text after "facility record" in the pdf I sent yesterday. I apologize for the confusion.

Regards,

Mike



# Michael Wieczorek | Senior Manager

ENVIRON International Corporation
333 W. Wacker Drive | Suite 2700| Chicago, IL 60606
T: +1 312 288 3879 | F: +1 312 288 3801 | M: +1 312 479 1433
mwieczorek@environcorp.com

From: Mike Wieczorek [/O=ENVIRONCORP/OU=EXCHANGE ADMINISTRATIVE GROUP

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=MWIECZOREK]

**Sent**: 2/18/2015 10:51:49 PM

To: Layton Willoughby, Kristen [KWilloug@idem.IN.gov]

CC: 'Graves, Randy' (Randy.Graves@mgpingredients.com) [Randy.Graves@mgpingredients.com]; Hussain, Munim

[Munim.Hussain@mgpingredients.com]; Mikhil Shetty [mshetty@environcorp.com]

Subject: MGPI of Indiana SSM 029-35276-00005 / SPM 029-35318-00005

Attachments: MGPI - Dryer Permit Application Revised 2015-02-18.pdf; MGPI DDG Emission Est Final 2015-02-18 IDEM.xlsx

#### Kristen,

Please see attached a revised permit application for MGPI in Lawrenceburg as we've recently discussed. The scope of the project is the same as the December 2014 permit application that's been under review; we're now relying on a netting analysis to demonstrate that PSD is not triggered for PM2.5. The facility will be submitting a signed hardcopy to IDEM Air Permits Administration, but in the meantime I wanted to get a copy out to you. I've also attached the revised emission calculations in .xls format.

If you have questions as you proceed please don't hesitate to contact me.

Regards,

Mike



# Michael Wieczorek | Senior Manager

ENVIRON International Corporation 333 W. Wacker Drive | Suite 2700| Chicago, IL 60606 T: +1 312 288 3879 | F: +1 312 288 3801 | M: +1 312 479 1433 mwieczorek@environcorp.com

From: Layton Willoughby, Kristen [KWilloug@idem.IN.gov]

**Sent**: 1/7/2015 9:00:37 PM

**To**: Mike Wieczorek [mwieczorek@environcorp.com]

CC: 'Graves, Randy' (Randy.Graves@mgpingredients.com) [Randy.Graves@mgpingredients.com]

Subject: NOD: MGPI of Indiana SSM 029-35276-00005 / SPM 029-35318-00005

Attachments: MGPI NOD.docx

Good Afternoon Mike,

I hope you feel better soon.

After reviewing the MGPI application, I have a few questions / need some additional information. Attached is a list of questions I have for you.

Please let me know if you have any questions or need further clarification.

Your written response to this first notice of deficiency (NOD) must be received within thirty (30) days of your receipt of this letter. An e-mail response is adequate.

Pursuant to IC 13-15-4, the accountability time frame will be suspended until the additional information has been received and determined to be adequate.

If you have questions regarding requested information, please call me at 317-233-3031or 1-800-451-6027 (ext 3-3031). Please specify SSM no. 029-35276-00005 and SPM No. 029-35318-00005 on inquiries or correspondence.

Thank you,

Kristen Willoughby

Senior Environmental Manager 100 North Senate Ave. MC 61-53 IGCN N1003 Indianapolis, IN 46204 Telephone: (317) 233-3031

Fax: (317) 232-6749 kwilloug@idem.IN.gov

From: Layton Willoughby, Kristen [KWilloug@idem.IN.gov]

Sent: 5/27/2015 3:07:36 PM

**To**: Hussain, Munim [Munim.Hussain@mgpingredients.com]

CC: Mike Wieczorek [mwieczorek@environcorp.com]; Graves, Randy [Randy.Graves@mgpingredients.com]

Subject: RE: DRAFT: MGPI SSM 029-35496-00005 / SPM 029-35505-00005

Attachments: 35505 TSD.docx; 35505 Att B.docx; 35505 BACT.docx; 35505 Calc A.xls; 35505 Calc B.xlsx; 35505 per.doc; 35505 SPM

let.docx

#### Good Morning,

MGPI's permit modification has been issued. IDEM did not receive any comments from the EPA. Attached are the electronic files. Please let me know if you have any questions.

# Sincerely,

# Kristen Willoughby

Senior Environmental Manager 100 North Senate Ave. MC 61-53 IGCN N1003 Indianapolis, IN 46204 Telephone: (317) 233-3031

Fax: (317) 232-6749 kwilloug@idem.IN.gov

From: Hussain, Munim [mailto:Munim.Hussain@mgpingredients.com]

Sent: Monday, May 11, 2015 2:46 PM

To: Layton Willoughby, Kristen

Cc: Hussain, Munim; Mike Wieczorek; Graves, Randy

Subject: Re: DRAFT: MGPI SSM 029-35496-00005 / SPM 029-35505-00005

Kristen,

Excellent! Thank you very much. We really appreciate your support.

Regards,

-Munim

Sent from my iPhone

On May 11, 2015, at 1:03 PM, Layton Willoughby, Kristen < <a href="mailto:KWilloug@idem.IN.gov">KWilloug@idem.IN.gov</a>> wrote: Munim,

MGPI's source modification has been issued. You may start construction. The source modification has been approved for a 15 day EPA review. I will let you know if we receive any comments / when the permit has been issued. Attached are copies of the electronic files for the source modification. Please let me know if you have any questions.

### Sincerely,

Kristen Willoughby
Senior Environmental Manager
100 North Senate Ave.
MC 61-53 IGCN N1003

Indianapolis, IN 46204 Telephone: (317) 233-3031

Fax: (317) 232-6749 kwilloug@idem.IN.gov

From: Hussain, Munim [mailto:Munim.Hussain@mgpingredients.com]

**Sent:** Thursday, April 09, 2015 3:29 PM

To: Layton Willoughby, Kristen; Mike Wieczorek

Cc: Graves, Randy

Subject: RE: DRAFT: MGPI SSM 029-35496-00005 / SPM 029-35505-00005

Kristen,

Thank you so much for clarifying this information to us. We appreciate your continued support.

Regards,

#### Munim Hussain

Corporate Environmental Engineer



MGP Ingredients, Inc. 913.360.5444 (t) | 309.472.7851 (c) | 913.360.5644 (f) mgpingredients.com

From: Layton Willoughby, Kristen [mailto:KWilloug@idem.IN.gov]

**Sent:** Thursday, April 09, 2015 1:39 PM **To:** Mike Wieczorek; Hussain, Munim

Cc: Graves, Randy

**Subject:** RE: DRAFT: MGPI SSM 029-35496-00005 / SPM 029-35505-00005

Mike,

I have answered you questions below in black. Please let me know if you have any other questions.

Sincerely,

Kristen Willoughby

Senior Environmental Manager 100 North Senate Ave. MC 61-53 IGCN N1003 Indianapolis, IN 46204 Telephone: (317) 233-3031

Fax: (317) 232-6749 kwilloug@idem.IN.gov

From: Mike Wieczorek [mailto:mwieczorek@environcorp.com]

Sent: Thursday, April 09, 2015 12:03 PM

To: Layton Willoughby, Kristen; Hussain, Munim

Cc: Graves, Randy

Subject: RE: DRAFT: MGPI SSM 029-35496-00005 / SPM 029-35505-00005

Just a couple questions for you to make sure we understand the timing of what will happen between now and issuance of MGPI's final permits:

- The public comment period will end on 4/30. If no comments are received, how soon after the period closes can
  we expect the source modification to be issued giving authorization to commence construction? One to two
  weeks. We need to wait a few days to make sure no comments come in the mail and then our administrative
  staff need time to process the permit for issuance. The state is closed May 5<sup>th</sup> for primary elections, so I am
  factoring this into the estimate.
- 2. Does the USEPA 45-day review period also need to close before the source modification will be issued? No. Only the permit modification will go to the EPA for review. If we do not receive any comments, then the EPA will only take an additional 15 day review on top of the 30 day public notice period. The only source modifications that went through PSD, Emission Offset, or Non-Attainment NSR are subject to the additional 15 or 45 day EPA review.

Thanks for your continued help, Mike

<image002.jpg>

Michael Wieczorek | Senior Manager

ENVIRON International Corporation 333 W. Wacker Drive | Suite 2700| Chicago, IL 60606 T: +1 312 288 3879 | F: +1 312 288 3801 | M: +1 312 479 1433 mwieczorek@environcorp.com

From: Layton Willoughby, Kristen [mailto:KWilloug@idem.IN.gov]

**Sent:** Wednesday, April 08, 2015 6:14 AM **To:** Hussain, Munim; Mike Wieczorek

Cc: Graves, Randy

**Subject:** RE: DRAFT: MGPI SSM 029-35496-00005 / SPM 029-35505-00005

Good Morning Munim,

We have received confirmation form the Journal Press that the legal public notice did run on 03/31/2015.

Sincerely,

Kristen Willoughby

Senior Environmental Manager 100 North Senate Ave. MC 61-53 IGCN N1003 Indianapolis, IN 46204 Telephone: (317) 233-3031

Fax: (317) 232-6749 kwilloug@idem.IN.gov

**From:** Layton Willoughby, Kristen **Sent:** Tuesday, April 07, 2015 1:25 PM **To:** 'Hussain, Munim'; Mike Wieczorek

Cc: Graves, Randy

Subject: RE: DRAFT: MGPI SSM 029-35496-00005 / SPM 029-35505-00005

### Good Afternoon Munim,

I do not have a link to the paper's public notices. We have a call into the paper to verify that it published. I will let you know once we hear back from them.

## Sincerely,

Kristen Willoughby

Senior Environmental Manager 100 North Senate Ave. MC 61-53 IGCN N1003 Indianapolis, IN 46204 Telephone: (317) 233-3031

Fax: (317) 232-6749 kwilloug@idem.IN.gov

From: Hussain, Munim [mailto:Munim.Hussain@mgpingredients.com]

Sent: Friday, April 03, 2015 11:23 AM

To: Layton Willoughby, Kristen; Mike Wieczorek

Cc: Graves, Randy

Subject: RE: DRAFT: MGPI SSM 029-35496-00005 / SPM 029-35505-00005

Hello Kristen,

I tried to locate the public notice in the Journal Press online. However, I could not find it. Is there a web-link that you can forward to us?

Regards,

### **Munim Hussain**

Corporate Environmental Engineer



MGP Ingredients, Inc. 913.360.5444 (t) | 309.472.7851 (c) | 913.360.5644 (f) mgpingredients.com

From: Layton Willoughby, Kristen [mailto:KWilloug@idem.IN.gov]

Sent: Monday, March 30, 2015 11:46 AM

To: Mike Wieczorek

Cc: Graves, Randy; Hussain, Munim

**Subject:** RE: DRAFT: MGPI SSM 029-35496-00005 / SPM 029-35505-00005

Hello Mike,

No I did not have any questions on the comments submitted. MGPI has been scheduled for public notice in the Journal Press on March 31, 2015. Attached are copies of the electronic files. Please let me know if you have any questions / comments.

Thank you,

Kristen Willoughby
Senior Environmental Manager
100 North Senate Ave.
MC 61-53 IGCN N1003
Indianapolis, IN 46204
Telephone: (317) 233-3031

Fax: (317) 232-6749 kwilloug@idem.IN.gov

From: Mike Wieczorek [mailto:mwieczorek@environcorp.com]

Sent: Monday, March 30, 2015 10:08 AM

To: Layton Willoughby, Kristen

Subject: RE: DRAFT: MGPI SSM 029-35496-00005 / SPM 029-35505-00005

Kristen,

I'm writing to check in on the MGPI permit. Do you have any questions on the comments we submitted? And do you have an estimate of when the permit will be going to public comment?

Thanks again for your work on this, Mike

<image002.jpg>

# Michael Wieczorek | Senior Manager

ENVIRON International Corporation
333 W. Wacker Drive | Suite 2700| Chicago, IL 60606
T: +1 312 288 3879 | F: +1 312 288 3801 | M: +1 312 479 1433
mwieczorek@environcorp.com

From: Mike Wieczorek

**Sent:** Thursday, March 19, 2015 10:36 PM

To: 'Layton Willoughby, Kristen'

Cc: Hussain, Munim (Munim.Hussain@mgpingredients.com); 'Graves, Randy' (Randy.Graves@mgpingredients.com)

Subject: RE: DRAFT: MGPI SSM 029-35496-00005 / SPM 029-35505-00005

Kristen,

Thanks again for the opportunity to review and provide comments to the draft permit. Please find our comments attached. Comments are included in track changes within the .doc files. Within the spreadsheets comments are indicated by highlighting and/or red font.

I'm available tomorrow until about 2 pm central time if you'd like to discuss in more detail or have any questions, and am available early next week as well.

Regards, Mike

<image002.jpg>

Michael Wieczorek | Senior Manager

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333 W. Wacker Drive | Suite 2700| Chicago, IL 60606
T: +1 312 288 3879 | F: +1 312 288 3801 | M: +1 312 479 1433
mwieczorek@environcorp.com

From: Layton Willoughby, Kristen [mailto:KWilloug@idem.IN.gov]

Sent: Monday, March 09, 2015 10:45 AM

To: Mike Wieczorek

Cc: Hussain, Munim (Munim.Hussain@mgpingredients.com); 'Graves, Randy' (Randy.Graves@mgpingredients.com)

Subject: DRAFT: MGPI SSM 029-35496-00005 / SPM 029-35505-00005

Hello Mike,

Enclosed you will find MGPI's draft permit, potential to emit calculations, and technical support document for review. I have only enclosed the source modification drafts since the permit modification documents are identical to the source modifications documents except for the cover letter. As a courtesy, this draft is being provided to you for an opportunity to look at it and provide comments, prior to the publication of the public notice. This supplemental step of providing you the draft permit does not take away your legal right to provide comments during the 30-day comment period.

The time clock for SSM No. 029-35496-00005 and SPM No. 029-35505-00005 will be stopped during your review until you either provide comments or indicate that you do not have any comments. Due to permit accountability and the intention to public notice your permit in a timely manner; you are being allotted two (2) weeks to provide comments in writing. During this review, I will be available to address your concerns and answer any questions that you may have, or to make necessary revisions to this draft. If you have any conflicts or special circumstances that would impede your review process during the time allotted, please notify me directly at the email address or phone number listed below as soon as possible. If you have not responded by the date of Monday, March 23, 2015, IDEM will assume that you have no comments pertaining to this draft and all files will be forwarded for public notice.

Please pay close attention to the listing of the emission units in Section A, by verifying if these units are specified as they were constructed in your source, and Section D, which specifies applicable requirements to these units. Sections B and C are mostly standard conditions that apply to all Part 70 sources.

Please send a reply email to me immediately confirming that you have received this draft version of the permit for review, and that you are able to access these files in their current format.

As an FIY - I am in a training class most of this week. Therefore, the best way to reach me this week is by email.

Thank you,

Kristen Willoughby

Senior Environmental Manager
100 North Senate Ave.

MC 61-53 IGCN N1003
Indianapolis, IN 46204
Telephone: (317) 233-3031

Fax: (317) 232-6749 kwilloug@idem.IN.gov

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- <35496 TSD.docx>
- <35496 Att A.doc>
- <35496 Att B.docx>
- <35496 Att C.doc>
- <35496 BACT.docx>
- <35496 Calc A.xls>
- <35496 Calc B.xlsx>
- <35496 per.doc>

From: Hussain, Munim [Munim.Hussain@mgpingredients.com]

**Sent**: 4/3/2015 3:22:49 PM

To: 'Layton Willoughby, Kristen' [KWilloug@idem.IN.gov]; Mike Wieczorek [mwieczorek@environcorp.com]

**CC**: Graves, Randy [Randy.Graves@mgpingredients.com]

Subject: RE: DRAFT: MGPI SSM 029-35496-00005 / SPM 029-35505-00005

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Regards,

#### **Munim Hussain**

Corporate Environmental Engineer



MGP Ingredients, Inc.

913.360.5444 (t) | 309.472.7851 (c) | 913.360.5644 (f) mgpingredients.com

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Thank you,

Kristen Willoughby

Senior Environmental Manager 100 North Senate Ave. MC 61-53 IGCN N1003 Indianapolis, IN 46204 Telephone: (317) 233-3031

Fax: (317) 232-6749 kwilloug@idem.IN.gov

**From:** Mike Wieczorek [mailto:mwieczorek@environcorp.com]

Sent: Monday, March 30, 2015 10:08 AM

To: Layton Willoughby, Kristen

**Subject:** RE: DRAFT: MGPI SSM 029-35496-00005 / SPM 029-35505-00005

Kristen,

I'm writing to check in on the MGPI permit. Do you have any questions on the comments we submitted? And do you have an estimate of when the permit will be going to public comment?

Thanks again for your work on this,

Mike



# Michael Wieczorek | Senior Manager

ENVIRON International Corporation 333 W. Wacker Drive | Suite 2700| Chicago, IL 60606 T: +1 312 288 3879 | F: +1 312 288 3801 | M: +1 312 479 1433 mwieczorek@environcorp.com

From: Mike Wieczorek

Sent: Thursday, March 19, 2015 10:36 PM

To: 'Layton Willoughby, Kristen'

Cc: Hussain, Munim (Munim.Hussain@mgpingredients.com); 'Graves, Randy' (Randy.Graves@mgpingredients.com)

Subject: RE: DRAFT: MGPI SSM 029-35496-00005 / SPM 029-35505-00005

Kristen,

Thanks again for the opportunity to review and provide comments to the draft permit. Please find our comments attached. Comments are included in track changes within the .doc files. Within the spreadsheets comments are indicated by highlighting and/or red font.

I'm available tomorrow until about 2 pm central time if you'd like to discuss in more detail or have any questions, and am available early next week as well.

Regards,

Mike



### Michael Wieczorek | Senior Manager

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T: +1 312 288 3879 | F: +1 312 288 3801 | M: +1 312 479 1433
mwieczorek@environcorp.com

From: Layton Willoughby, Kristen [mailto:KWilloug@idem.IN.gov]

**Sent:** Monday, March 09, 2015 10:45 AM

To: Mike Wieczorek

Cc: Hussain, Munim (Munim.Hussain@mgpingredients.com); 'Graves, Randy' (Randy.Graves@mgpingredients.com)

**Subject:** DRAFT: MGPI SSM 029-35496-00005 / SPM 029-35505-00005

Hello Mike.

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The time clock for SSM No. 029-35496-00005 and SPM No. 029-35505-00005 will be stopped during your review until you either provide comments or indicate that you do not have any comments. Due to permit accountability and the intention to public notice your permit in a timely manner; you are being allotted two (2) weeks to provide comments in writing. During this review, I will be available to address your concerns and answer any questions that you may have, or to make necessary revisions to this draft. If you have any conflicts or special circumstances that would impede your review process during the time allotted, please notify me directly at the email address or phone number listed below as soon as possible. If you have not responded by the date of Monday, March 23, 2015, IDEM will assume that you have no comments pertaining to this draft and all files will be forwarded for public notice.

Please pay close attention to the listing of the emission units in Section A, by verifying if these units are specified as they were constructed in your source, and Section D, which specifies applicable requirements to these units. Sections B and C are mostly standard conditions that apply to all Part 70 sources.

Please send a reply email to me immediately confirming that you have received this draft version of the permit for review, and that you are able to access these files in their current format.

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Thank you,

Kristen Willoughby

Senior Environmental Manager
100 North Senate Ave.

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Fax: (317) 232-6749 kwilloug@idem.IN.gov

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From: Layton Willoughby, Kristen [KWilloug@idem.IN.gov]

**Sent**: 3/30/2015 4:45:33 PM

**To**: Mike Wieczorek [mwieczorek@environcorp.com]

CC: 'Graves, Randy' (Randy.Graves@mgpingredients.com) [Randy.Graves@mgpingredients.com]; Hussain, Munim

(Munim.Hussain@mgpingredients.com) [Munim.Hussain@mgpingredients.com]

Subject: RE: DRAFT: MGPI SSM 029-35496-00005 / SPM 029-35505-00005

Attachments: 35496 TSD.docx; 35496 BACT.docx; 35496 Calc A.xls; 35496 Calc B.xlsx; 35496 per.doc; 35505 TSD.docx; 35505

BACT.docx; 35505 Calc A.xls; 35505 Calc B.xlsx; 35505 per.doc

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Kristen Willoughby

Senior Environmental Manager 100 North Senate Ave. MC 61-53 IGCN N1003 Indianapolis, IN 46204 Telephone: (317) 233-3031

Fax: (317) 232-6749 kwilloug@idem.IN.gov

From: Mike Wieczorek [mailto:mwieczorek@environcorp.com]

**Sent:** Monday, March 30, 2015 10:08 AM

To: Layton Willoughby, Kristen

Subject: RE: DRAFT: MGPI SSM 029-35496-00005 / SPM 029-35505-00005

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# Michael Wieczorek | Senior Manager

ENVIRON International Corporation 333 W. Wacker Drive | Suite 2700| Chicago, IL 60606 T: +1 312 288 3879 | F: +1 312 288 3801 | M: +1 312 479 1433 mwieczorek@environcorp.com

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To: 'Layton Willoughby, Kristen'

Cc: Hussain, Munim (Munim.Hussain@mgpingredients.com); 'Graves, Randy' (Randy.Graves@mgpingredients.com)

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Regards, Mike



# Michael Wieczorek | Senior Manager

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**Sent:** Monday, March 09, 2015 10:45 AM

To: Mike Wieczorek

Cc: Hussain, Munim (Munim.Hussain@mgpingredients.com); 'Graves, Randy' (Randy.Graves@mgpingredients.com)

Subject: DRAFT: MGPI SSM 029-35496-00005 / SPM 029-35505-00005

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The time clock for SSM No. 029-35496-00005 and SPM No. 029-35505-00005 will be stopped during your review until you either provide comments or indicate that you do not have any comments. Due to permit accountability and the intention to public notice your permit in a timely manner; you are being allotted two (2) weeks to provide comments in writing. During this review, I will be available to address your concerns and answer any questions that you may have, or to make necessary revisions to this draft. If you have any conflicts or special circumstances that would impede your review process during the time allotted, please notify me directly at the email address or phone number listed below as soon as possible. If you have not responded by the date of Monday, March 23, 2015, IDEM will assume that you have no comments pertaining to this draft and all files will be forwarded for public notice.

Please pay close attention to the listing of the emission units in Section A, by verifying if these units are specified as they were constructed in your source, and Section D, which specifies applicable requirements to these units. Sections B and C are mostly standard conditions that apply to all Part 70 sources.

Please send a reply email to me immediately confirming that you have received this draft version of the permit for review, and that you are able to access these files in their current format.

As an FIY - I am in a training class most of this week. Therefore, the best way to reach me this week is by email.

Thank you,

Kristen Willoughby

Senior Environmental Manager
100 North Senate Ave.

MC 61-53 IGCN N1003
Indianapolis, IN 46204
Telephone: (317) 233-3031

Fax: (317) 232-6749 kwilloug@idem.IN.gov

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From: Mike Wieczorek [/O=ENVIRONCORP/OU=EXCHANGE ADMINISTRATIVE GROUP

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=MWIECZOREK]

**Sent**: 3/30/2015 2:07:55 PM

To: Layton Willoughby, Kristen [KWilloug@idem.IN.gov]

**Subject**: RE: DRAFT: MGPI SSM 029-35496-00005 / SPM 029-35505-00005

#### Kristen,

I'm writing to check in on the MGPI permit. Do you have any questions on the comments we submitted? And do you have an estimate of when the permit will be going to public comment?

Thanks again for your work on this, Mike



# Michael Wieczorek | Senior Manager

ENVIRON International Corporation 333 W. Wacker Drive | Suite 2700| Chicago, IL 60606 T: +1 312 288 3879 | F: +1 312 288 3801 | M: +1 312 479 1433 mwieczorek@environcorp.com

From: Mike Wieczorek

**Sent:** Thursday, March 19, 2015 10:36 PM

To: 'Layton Willoughby, Kristen'

Cc: Hussain, Munim (Munim.Hussain@mgpingredients.com); 'Graves, Randy' (Randy.Graves@mgpingredients.com)

Subject: RE: DRAFT: MGPI SSM 029-35496-00005 / SPM 029-35505-00005

### Kristen,

Thanks again for the opportunity to review and provide comments to the draft permit. Please find our comments attached. Comments are included in track changes within the .doc files. Within the spreadsheets comments are indicated by highlighting and/or red font.

I'm available tomorrow until about 2 pm central time if you'd like to discuss in more detail or have any questions, and am available early next week as well.

#### Regards,

Mike



# Michael Wieczorek | Senior Manager

ENVIRON International Corporation 333 W. Wacker Drive | Suite 2700| Chicago, IL 60606 T: +1 312 288 3879 | F: +1 312 288 3801 | M: +1 312 479 1433 mwieczorek@environcorp.com

From: Layton Willoughby, Kristen [mailto:KWilloug@idem.IN.gov]

Sent: Monday, March 09, 2015 10:45 AM

To: Mike Wieczorek

Cc: Hussain, Munim (Munim.Hussain@mgpingredients.com); 'Graves, Randy' (Randy.Graves@mgpingredients.com)

Subject: DRAFT: MGPI SSM 029-35496-00005 / SPM 029-35505-00005

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100 North Senate Ave.

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Telephone: (317) 233-3031

Fax: (317) 232-6749 kwilloug@idem.IN.gov

From: Mike Wieczorek [/O=ENVIRONCORP/OU=EXCHANGE ADMINISTRATIVE GROUP

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=MWIECZOREK]

**Sent**: 3/20/2015 3:36:01 AM

To: Layton Willoughby, Kristen [KWilloug@idem.IN.gov]

CC: Hussain, Munim (Munim.Hussain@mgpingredients.com) [Munim.Hussain@mgpingredients.com]; 'Graves, Randy'

(Randy.Graves@mgpingredients.com) [Randy.Graves@mgpingredients.com]

Subject: RE: DRAFT: MGPI SSM 029-35496-00005 / SPM 029-35505-00005

Attachments: 35496 per MGPI comments 2015-03-19.doc; 35496 TSD MGPI comments 2015-03-19.docx; 35496 BACT MGPI

comments 2015-03-19.docx; MGPI Permit 35496 Calculation comments.docx; 35496 Calc A.xls; 35496 Calc B.xlsx

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From: Layton Willoughby, Kristen [mailto:KWilloug@idem.IN.gov]

**Sent:** Monday, March 09, 2015 10:45 AM

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From: Mike Wieczorek [/O=ENVIRONCORP/OU=EXCHANGE ADMINISTRATIVE GROUP

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=MWIECZOREK]

**Sent**: 3/9/2015 3:55:19 PM

**To**: Layton Willoughby, Kristen [KWilloug@idem.IN.gov]

CC: Hussain, Munim (Munim.Hussain@mgpingredients.com) [Munim.Hussain@mgpingredients.com]; 'Graves, Randy'

(Randy.Graves@mgpingredients.com) [Randy.Graves@mgpingredients.com]; Mikhil Shetty

[mshetty@environcorp.com]

Subject: RE: DRAFT: MGPI SSM 029-35496-00005 / SPM 029-35505-00005

Kristen,

Thank you for providing the draft documents for our review. I am able to access the 8 attachments that you included.

We'll get comments back to you as soon as we can.

Regards, Mike



# Michael Wieczorek | Senior Manager

ENVIRON International Corporation
333 W. Wacker Drive | Suite 2700| Chicago, IL 60606
T: +1 312 288 3879 | F: +1 312 288 3801 | M: +1 312 479 1433
mwieczorek@environcorp.com

From: Layton Willoughby, Kristen [mailto:KWilloug@idem.IN.gov]

Sent: Monday, March 09, 2015 10:45 AM

To: Mike Wieczorek

Cc: Hussain, Munim (Munim.Hussain@mgpingredients.com); 'Graves, Randy' (Randy.Graves@mgpingredients.com)

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100 North Senate Ave.

MC 61-53 IGCN N1003
Indianapolis, IN 46204
Telephone: (317) 233-3031

Fax: (317) 232-6749 kwilloug@idem.IN.gov

From: Hussain, Munim [Munim.Hussain@mgpingredients.com]

**Sent**: 5/11/2015 6:46:11 PM

To: Layton Willoughby, Kristen [KWilloug@idem.IN.gov]

CC: Hussain, Munim [Munim.Hussain@mgpingredients.com]; Mike Wieczorek [mwieczorek@environcorp.com]; Graves,

Randy [Randy.Graves@mgpingredients.com]

**Subject**: Re: DRAFT: MGPI SSM 029-35496-00005 / SPM 029-35505-00005

Kristen,

Excellent! Thank you very much. We really appreciate your support.

Regards,

-Munim

Sent from my iPhone

On May 11, 2015, at 1:03 PM, Layton Willoughby, Kristen < <a href="mailto:KWilloug@idem.IN.gov">KWilloug@idem.IN.gov</a>> wrote: Munim,

MGPI's source modification has been issued. You may start construction. The source modification has been approved for a 15 day EPA review. I will let you know if we receive any comments / when the permit has been issued. Attached are copies of the electronic files for the source modification. Please let me know if you have any questions.

### Sincerely,

Kristen Willoughby

Senior Environmental Manager 100 North Senate Ave. MC 61-53 IGCN N1003 Indianapolis, IN 46204 Telephone: (317) 233-3031

Fax: (317) 232-6749 kwilloug@idem.IN.gov

From: Hussain, Munim [mailto:Munim.Hussain@mgpingredients.com]

**Sent:** Thursday, April 09, 2015 3:29 PM

To: Layton Willoughby, Kristen; Mike Wieczorek

Cc: Graves, Randy

**Subject:** RE: DRAFT: MGPI SSM 029-35496-00005 / SPM 029-35505-00005

Kristen,

Thank you so much for clarifying this information to us. We appreciate your continued support.

Regards,

#### Munim Hussain

Corporate Environmental Engineer



MGP Ingredients, Inc. 913.360.5444 (t) | 309.472.7851 (c) | 913.360.5644 (f) mgpingredients.com

From: Layton Willoughby, Kristen [mailto:KWilloug@idem.IN.gov]

**Sent:** Thursday, April 09, 2015 1:39 PM **To:** Mike Wieczorek; Hussain, Munim

Cc: Graves, Randy

Subject: RE: DRAFT: MGPI SSM 029-35496-00005 / SPM 029-35505-00005

Mike,

I have answered you questions below in black. Please let me know if you have any other questions.

Sincerely,

Kristen Willoughby
Senior Environmental Manager
100 North Senate Ave.
MC 61-53 IGCN N1003
Indianapolis, IN 46204
Telephone: (317) 233-3031

Fax: (317) 232-6749 kwilloug@idem.IN.gov

From: Mike Wieczorek [mailto:mwieczorek@environcorp.com]

**Sent:** Thursday, April 09, 2015 12:03 PM

To: Layton Willoughby, Kristen; Hussain, Munim

Cc: Graves, Randy

Subject: RE: DRAFT: MGPI SSM 029-35496-00005 / SPM 029-35505-00005

Kristen,

Just a couple questions for you to make sure we understand the timing of what will happen between now and issuance of MGPI's final permits:

- <!--[if !supportLists]--><!--[endif]-->The public comment period will end on 4/30. If no comments are received, how soon after the period closes can we expect the source modification to be issued giving authorization to commence construction? One to two weeks. We need to wait a few days to make sure no comments come in the mail and then our administrative staff need time to process the permit for issuance. The state is closed May 5<sup>th</sup> for primary elections, so I am factoring this into the estimate.
- 2. <!--[if !supportLists]--><!--[endif]-->Does the USEPA 45-day review period also need to close before the source modification will be issued? No. Only the permit modification will go to the EPA for review. If we do not receive any comments, then the EPA will only take an additional 15 day review on top of the 30 day public notice period. The only source modifications that went through PSD, Emission Offset, or Non-Attainment NSR are subject to the additional 15 or 45 day EPA review.

Thanks for your continued help, Mike

<image002.jpg>

# Michael Wieczorek | Senior Manager

**ENVIRON International Corporation** 

333 W. Wacker Drive | Suite 2700 | Chicago, IL 60606

T: +1 312 288 3879 | F: +1 312 288 3801 | M: +1 312 479 1433

mwieczorek@environcorp.com

From: Layton Willoughby, Kristen [mailto:KWilloug@idem.IN.gov]

**Sent:** Wednesday, April 08, 2015 6:14 AM **To:** Hussain, Munim; Mike Wieczorek

Cc: Graves, Randy

Subject: RE: DRAFT: MGPI SSM 029-35496-00005 / SPM 029-35505-00005

Good Morning Munim,

We have received confirmation form the Journal Press that the legal public notice did run on 03/31/2015.

Sincerely,

# Kristen Willoughby

Senior Environmental Manager 100 North Senate Ave. MC 61-53 IGCN N1003 Indianapolis, IN 46204 Telephone: (317) 233-3031

Fax: (317) 232-6749 kwilloug@idem.IN.gov

**From:** Layton Willoughby, Kristen **Sent:** Tuesday, April 07, 2015 1:25 PM **To:** 'Hussain, Munim'; Mike Wieczorek

Cc: Graves, Randy

Subject: RE: DRAFT: MGPI SSM 029-35496-00005 / SPM 029-35505-00005

Good Afternoon Munim,

I do not have a link to the paper's public notices. We have a call into the paper to verify that it published. I will let you know once we hear back from them.

Sincerely,

# Kristen Willoughby

Senior Environmental Manager 100 North Senate Ave. MC 61-53 IGCN N1003

Indianapolis, IN 46204 Telephone: (317) 233-3031

Fax: (317) 232-6749 kwilloug@idem.IN.gov

From: Hussain, Munim [mailto:Munim.Hussain@mgpingredients.com]

**Sent:** Friday, April 03, 2015 11:23 AM

To: Layton Willoughby, Kristen; Mike Wieczorek

Cc: Graves, Randy

Subject: RE: DRAFT: MGPI SSM 029-35496-00005 / SPM 029-35505-00005

Hello Kristen,

I tried to locate the public notice in the Journal Press online. However, I could not find it. Is there a web-link that you can forward to us?

Regards,

#### **Munim Hussain**

Corporate Environmental Engineer



MGP Ingredients, Inc. 913.360.5444 (t) | 309.472.7851 (c) | 913.360.5644 (f) mgpingredients.com

From: Layton Willoughby, Kristen [mailto:KWilloug@idem.IN.gov]

Sent: Monday, March 30, 2015 11:46 AM

To: Mike Wieczorek

Cc: Graves, Randy; Hussain, Munim

**Subject:** RE: DRAFT: MGPI SSM 029-35496-00005 / SPM 029-35505-00005

Hello Mike,

No I did not have any questions on the comments submitted. MGPI has been scheduled for public notice in the Journal Press on March 31, 2015. Attached are copies of the electronic files. Please let me know if you have any questions / comments.

Thank you,

Kristen Willoughby

Senior Environmental Manager 100 North Senate Ave. MC 61-53 IGCN N1003 Indianapolis, IN 46204 Telephone: (317) 233-3031

Fax: (317) 232-6749 kwilloug@idem.IN.gov

From: Mike Wieczorek [mailto:mwieczorek@environcorp.com]

Sent: Monday, March 30, 2015 10:08 AM

To: Layton Willoughby, Kristen

Subject: RE: DRAFT: MGPI SSM 029-35496-00005 / SPM 029-35505-00005

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Thanks again for your work on this,

Mike

# <image002.jpg>

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Cc: Hussain, Munim (Munim.Hussain@mgpingredients.com); 'Graves, Randy' (Randy.Graves@mgpingredients.com)

Subject: RE: DRAFT: MGPI SSM 029-35496-00005 / SPM 029-35505-00005

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Mike

# <image002.jpg>

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**Sent:** Monday, March 09, 2015 10:45 AM

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Cc: Hussain, Munim (Munim.Hussain@mgpingredients.com); 'Graves, Randy' (Randy.Graves@mgpingredients.com)

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<35496 TSD.docx>

<35496 Att A.doc>

<35496 Att B.docx>

<35496 Att C.doc>

<35496 BACT.docx>

<35496 Calc A.xls>

<35496 Calc B.xlsx>

<35496 per.doc>

From: Layton Willoughby, Kristen [KWilloug@idem.IN.gov]

**Sent**: 5/11/2015 6:02:28 PM

To: Hussain, Munim [Munim.Hussain@mgpingredients.com]; Mike Wieczorek [mwieczorek@environcorp.com]

**CC**: Graves, Randy [Randy.Graves@mgpingredients.com]

**Subject**: RE: DRAFT: MGPI SSM 029-35496-00005 / SPM 029-35505-00005

Attachments: 35496 TSD.docx; 35496 Att A.doc; 35496 Att B.docx; 35496 Att C.doc; 35496 BACT.docx; 35496 Calc A.xls; 35496 Calc

B.xlsx; 35496 per.doc

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913.360.5444 (t) | 309.472.7851 (c) | 913.360.5644 (f) mgpingredients.com

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Cc: Graves, Randy

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Indianapolis, IN 46204
Telephone: (317) 233-3031

Fax: (317) 232-6749 kwilloug@idem.IN.gov

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**Sent:** Thursday, April 09, 2015 12:03 PM

To: Layton Willoughby, Kristen; Hussain, Munim

Cc: Graves, Randy

**Subject:** RE: DRAFT: MGPI SSM 029-35496-00005 / SPM 029-35505-00005

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soon as possible. If you have not responded by the date of Monday, March 23, 2015, IDEM will assume that you have no comments pertaining to this draft and all files will be forwarded for public notice.

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Senior Environmental Manager
100 North Senate Ave.

MC 61-53 IGCN N1003
Indianapolis, IN 46204
Telephone: (317) 233-3031

Fax: (317) 232-6749 kwilloug@idem.IN.gov

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From: Mike Wieczorek [/O=ENVIRONCORP/OU=EXCHANGE ADMINISTRATIVE GROUP

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=MWIECZOREK]

**Sent**: 4/9/2015 4:03:23 PM

To: Layton Willoughby, Kristen [KWilloug@idem.IN.gov]; Hussain, Munim [Munim.Hussain@mgpingredients.com]

**CC**: Graves, Randy [Randy.Graves@mgpingredients.com]

Subject: RE: DRAFT: MGPI SSM 029-35496-00005 / SPM 029-35505-00005

#### Kristen,

Just a couple questions for you to make sure we understand the timing of what will happen between now and issuance of MGPI's final permits:

- 1. The public comment period will end on 4/30. If no comments are received, how soon after the period closes can we expect the source modification to be issued giving authorization to commence construction?
- 2. Does the USEPA 45-day review period also need to close before the source modification will be issued?

Thanks for your continued help, Mike



# Michael Wieczorek | Senior Manager

ENVIRON International Corporation 333 W. Wacker Drive | Suite 2700| Chicago, IL 60606 T: +1 312 288 3879 | F: +1 312 288 3801 | M: +1 312 479 1433 mwieczorek@environcorp.com

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**Sent:** Wednesday, April 08, 2015 6:14 AM **To:** Hussain, Munim; Mike Wieczorek

Cc: Graves, Randy

**Subject:** RE: DRAFT: MGPI SSM 029-35496-00005 / SPM 029-35505-00005

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Thank you very much for confirming the date for public notice. We really appreciate your support.

Regards,

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Corporate Environmental Engineer



MGP Ingredients, Inc.

913.360.5444 (t) | 309.472.7851 (c) | 913.360.5644 (f) mgpingredients.com

From: Layton Willoughby, Kristen [mailto:KWilloug@idem.IN.gov]

**Sent:** Monday, March 30, 2015 11:46 AM

To: Mike Wieczorek

Cc: Graves, Randy; Hussain, Munim

**Subject:** RE: DRAFT: MGPI SSM 029-35496-00005 / SPM 029-35505-00005

Hello Mike,

No I did not have any questions on the comments submitted. MGPI has been scheduled for public notice in the Journal Press on March 31, 2015. Attached are copies of the electronic files. Please let me know if you have any questions / comments.

Thank you,

Kristen Willoughby

Senior Environmental Manager 100 North Senate Ave. MC 61-53 IGCN N1003 Indianapolis, IN 46204 Telephone: (317) 233-3031

Fax: (317) 232-6749 kwilloug@idem.IN.gov

From: Mike Wieczorek [mailto:mwieczorek@environcorp.com]

Sent: Monday, March 30, 2015 10:08 AM

To: Layton Willoughby, Kristen

Subject: RE: DRAFT: MGPI SSM 029-35496-00005 / SPM 029-35505-00005

Kristen,

I'm writing to check in on the MGPI permit. Do you have any questions on the comments we submitted? And do you have an estimate of when the permit will be going to public comment?

Thanks again for your work on this, Mike



## Michael Wieczorek | Senior Manager

ENVIRON International Corporation
333 W. Wacker Drive | Suite 2700| Chicago, IL 60606
T: +1 312 288 3879 | F: +1 312 288 3801 | M: +1 312 479 1433
mwieczorek@environcorp.com

From: Mike Wieczorek

**Sent:** Thursday, March 19, 2015 10:36 PM

To: 'Layton Willoughby, Kristen'

Cc: Hussain, Munim (Munim. Hussain@mgpingredients.com); 'Graves, Randy' (Randy. Graves@mgpingredients.com)

**Subject:** RE: DRAFT: MGPI SSM 029-35496-00005 / SPM 029-35505-00005

Kristen,

Thanks again for the opportunity to review and provide comments to the draft permit. Please find our comments attached. Comments are included in track changes within the .doc files. Within the spreadsheets comments are indicated by highlighting and/or red font.

I'm available tomorrow until about 2 pm central time if you'd like to discuss in more detail or have any questions, and am available early next week as well.

Regards, Mike



# Michael Wieczorek | Senior Manager

ENVIRON International Corporation 333 W. Wacker Drive | Suite 2700| Chicago, IL 60606 T: +1 312 288 3879 | F: +1 312 288 3801 | M: +1 312 479 1433 mwieczorek@environcorp.com

From: Layton Willoughby, Kristen [mailto:KWilloug@idem.IN.gov]

Sent: Monday, March 09, 2015 10:45 AM

To: Mike Wieczorek

Cc: Hussain, Munim (Munim.Hussain@mgpingredients.com); 'Graves, Randy' (Randy.Graves@mgpingredients.com)

**Subject:** DRAFT: MGPI SSM 029-35496-00005 / SPM 029-35505-00005

Hello Mike,

Enclosed you will find MGPI's draft permit, potential to emit calculations, and technical support document for review. I have only enclosed the source modification drafts since the permit modification documents are identical to the source modifications documents except for the cover letter. As a courtesy, this draft is being provided to you for an opportunity to look at it and provide comments, prior to the publication of the public notice. This supplemental step of providing you the draft permit does not take away your legal right to provide comments during the 30-day comment period.

The time clock for SSM No. 029-35496-00005 and SPM No. 029-35505-00005 will be stopped during your review until you either provide comments or indicate that you do not have any comments. Due to permit accountability and the intention to public notice your permit in a timely manner; you are being allotted two (2) weeks to provide comments in writing. During this review, I will be available to address your concerns and answer any questions that you may have, or to make necessary revisions to this draft. If you have any conflicts or special circumstances that would impede your review process during the time allotted, please notify me directly at the email address or phone number listed below as soon as possible. If you have not responded by the date of Monday, March 23, 2015, IDEM will assume that you have no comments pertaining to this draft and all files will be forwarded for public notice.

Please pay close attention to the listing of the emission units in Section A, by verifying if these units are specified as they were constructed in your source, and Section D, which specifies applicable requirements to these units. Sections B and C are mostly standard conditions that apply to all Part 70 sources.

Please send a reply email to me immediately confirming that you have received this draft version of the permit for review, and that you are able to access these files in their current format.

As an FIY – I am in a training class most of this week. Therefore, the best way to reach me this week is by email.

Thank you,

Kristen Willoughby

Senior Environmental Manager
100 North Senate Ave.

MC 61-53 IGCN N1003
Indianapolis, IN 46204

Telephone: (317) 233-3031

Fax: (317) 232-6749 kwilloug@idem.IN.gov

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From: Hussain, Munim [Munim.Hussain@mgpingredients.com]

**Sent**: 5/27/2015 3:29:00 PM

**To**: 'Layton Willoughby, Kristen' [KWilloug@idem.IN.gov]

CC: Mike Wieczorek [mwieczorek@environcorp.com]; Graves, Randy [Randy.Graves@mgpingredients.com]

Subject: RE: DRAFT: MGPI SSM 029-35496-00005 / SPM 029-35505-00005

# Good Morning Kristen,

Thank you very much for issuing the modified air permit for MGPI of Indiana. We really appreciate your continued support.

Sincerely,

#### **Munim Hussain**

Corporate Environmental Engineer



MGP Ingredients, Inc.

913.360.5444 (t) | 309.472.7851 (c) | 913.360.5644 (f) mgpingredients.com

From: Layton Willoughby, Kristen [mailto:KWilloug@idem.IN.gov]

**Sent:** Wednesday, May 27, 2015 10:08 AM

To: Hussain, Munim

Cc: Mike Wieczorek; Graves, Randy

Subject: RE: DRAFT: MGPI SSM 029-35496-00005 / SPM 029-35505-00005

#### Good Morning,

MGPI's permit modification has been issued. IDEM did not receive any comments from the EPA. Attached are the electronic files. Please let me know if you have any questions.

#### Sincerely,

Kristen Willoughby

Senior Environmental Manager 100 North Senate Ave. MC 61-53 IGCN N1003

Indianapolis, IN 46204 Telephone: (317) 233-3031

Fax: (317) 232-6749 kwilloug@idem.IN.gov

From: Hussain, Munim [mailto:Munim.Hussain@mgpingredients.com]

Sent: Monday, May 11, 2015 2:46 PM

To: Layton Willoughby, Kristen

Cc: Hussain, Munim; Mike Wieczorek; Graves, Randy

**Subject:** Re: DRAFT: MGPI SSM 029-35496-00005 / SPM 029-35505-00005

Kristen,

Excellent! Thank you very much. We really appreciate your support.

Regards,

-Munim

Sent from my iPhone

On May 11, 2015, at 1:03 PM, Layton Willoughby, Kristen < < KWilloug@idem.IN.gov > wrote: Munim,

MGPI's source modification has been issued. You may start construction. The source modification has been approved for a 15 day EPA review. I will let you know if we receive any comments / when the permit has been issued. Attached are copies of the electronic files for the source modification. Please let me know if you have any questions.

Sincerely,

Kristen Willoughby
Senior Environmental Manager
100 North Senate Ave.
MC 61-53 IGCN N1003
Indianapolis, IN 46204
Telephone: (317) 233-3031

Fax: (317) 232-6749 kwilloug@idem.IN.gov

From: Hussain, Munim [mailto:Munim.Hussain@mgpingredients.com]

**Sent:** Thursday, April 09, 2015 3:29 PM

To: Layton Willoughby, Kristen; Mike Wieczorek

Cc: Graves, Randy

Subject: RE: DRAFT: MGPI SSM 029-35496-00005 / SPM 029-35505-00005

Kristen,

Thank you so much for clarifying this information to us. We appreciate your continued support.

Regards,

#### **Munim Hussain**

Corporate Environmental Engineer



MGP Ingredients, Inc. 913.360.5444 (t) | 309.472.7851 (c) | 913.360.5644 (f) mgpingredients.com

From: Layton Willoughby, Kristen [mailto:KWilloug@idem.IN.gov]

**Sent:** Thursday, April 09, 2015 1:39 PM **To:** Mike Wieczorek; Hussain, Munim

Cc: Graves, Randy

**Subject:** RE: DRAFT: MGPI SSM 029-35496-00005 / SPM 029-35505-00005

Mike,

I have answered you questions below in black. Please let me know if you have any other questions.

Sincerely,

Kristen Willoughby

Senior Environmental Manager 100 North Senate Ave. MC 61-53 IGCN N1003 Indianapolis, IN 46204

Telephone: (317) 233-3031 Fax: (317) 232-6749

Fax: (317) 232-6749 kwilloug@idem.lN.gov

**From:** Mike Wieczorek [mailto:mwieczorek@environcorp.com]

Sent: Thursday, April 09, 2015 12:03 PM

**To:** Layton Willoughby, Kristen; Hussain, Munim

Cc: Graves, Randy

**Subject:** RE: DRAFT: MGPI SSM 029-35496-00005 / SPM 029-35505-00005

Kristen,

Just a couple questions for you to make sure we understand the timing of what will happen between now and issuance of MGPI's final permits:

- The public comment period will end on 4/30. If no comments are received, how soon after the period closes can
  we expect the source modification to be issued giving authorization to commence construction? One to two
  weeks. We need to wait a few days to make sure no comments come in the mail and then our administrative
  staff need time to process the permit for issuance. The state is closed May 5<sup>th</sup> for primary elections, so I am
  factoring this into the estimate.
- 2. Does the USEPA 45-day review period also need to close before the source modification will be issued? No. Only the permit modification will go to the EPA for review. If we do not receive any comments, then the EPA will only take an additional 15 day review on top of the 30 day public notice period. The only source modifications that went through PSD, Emission Offset, or Non-Attainment NSR are subject to the additional 15 or 45 day EPA review.

Thanks for your continued help,

Mike

<image002.jpg>

Michael Wieczorek | Senior Manager

ENVIRON International Corporation
333 W. Wacker Drive | Suite 2700| Chicago, IL 60606
T: +1 312 288 3879 | F: +1 312 288 3801 | M: +1 312 479 1433

mwieczorek@environcorp.com

From: Layton Willoughby, Kristen [mailto:KWilloug@idem.IN.gov]

**Sent:** Wednesday, April 08, 2015 6:14 AM **To:** Hussain, Munim; Mike Wieczorek

Cc: Graves, Randy

**Subject:** RE: DRAFT: MGPI SSM 029-35496-00005 / SPM 029-35505-00005

## Good Morning Munim,

We have received confirmation form the Journal Press that the legal public notice did run on 03/31/2015.

## Sincerely,

# Kristen Willoughby

Senior Environmental Manager 100 North Senate Ave. MC 61-53 IGCN N1003 Indianapolis, IN 46204 Telephone: (317) 233-3031

Fax: (317) 232-6749 kwilloug@idem.IN.gov

**From:** Layton Willoughby, Kristen **Sent:** Tuesday, April 07, 2015 1:25 PM **To:** 'Hussain, Munim'; Mike Wieczorek

Cc: Graves, Randy

**Subject:** RE: DRAFT: MGPI SSM 029-35496-00005 / SPM 029-35505-00005

#### Good Afternoon Munim,

I do not have a link to the paper's public notices. We have a call into the paper to verify that it published. I will let you know once we hear back from them.

#### Sincerely,

# Kristen Willoughby

Senior Environmental Manager 100 North Senate Ave. MC 61-53 IGCN N1003 Indianapolis, IN 46204 Telephone: (317) 233-3031

Fax: (317) 232-6749 kwilloug@idem.IN.gov

From: Hussain, Munim [mailto:Munim.Hussain@mgpingredients.com]

**Sent:** Friday, April 03, 2015 11:23 AM

To: Layton Willoughby, Kristen; Mike Wieczorek

Cc: Graves, Randy

**Subject:** RE: DRAFT: MGPI SSM 029-35496-00005 / SPM 029-35505-00005

Hello Kristen,

I tried to locate the public notice in the Journal Press online. However, I could not find it. Is there a web-link that you can forward to us?

Regards,

#### **Munim Hussain**

Corporate Environmental Engineer



# MGP Ingredients, Inc. 913.360.5444 (t) | 309.472.7851 (c) | 913.360.5644 (f) mgpingredients.com

From: Layton Willoughby, Kristen [mailto:KWilloug@idem.IN.gov]

Sent: Monday, March 30, 2015 11:46 AM

To: Mike Wieczorek

Cc: Graves, Randy; Hussain, Munim

**Subject:** RE: DRAFT: MGPI SSM 029-35496-00005 / SPM 029-35505-00005

Hello Mike,

No I did not have any questions on the comments submitted. MGPI has been scheduled for public notice in the Journal Press on March 31, 2015. Attached are copies of the electronic files. Please let me know if you have any questions / comments.

Thank you,

Kristen Willoughby

Senior Environmental Manager 100 North Senate Ave. MC 61-53 IGCN N1003 Indianapolis, IN 46204 Telephone: (317) 233-3031

Fax: (317) 232-6749 kwilloug@idem.IN.gov

From: Mike Wieczorek [mailto:mwieczorek@environcorp.com]

**Sent:** Monday, March 30, 2015 10:08 AM

To: Layton Willoughby, Kristen

Subject: RE: DRAFT: MGPI SSM 029-35496-00005 / SPM 029-35505-00005

Kristen,

I'm writing to check in on the MGPI permit. Do you have any questions on the comments we submitted? And do you have an estimate of when the permit will be going to public comment?

Thanks again for your work on this,

Mike

<image002.jpg>

Michael Wieczorek | Senior Manager

ENVIRON International Corporation 333 W. Wacker Drive | Suite 2700| Chicago, IL 60606

T: +1 312 288 3879 | F: +1 312 288 3801 | M: +1 312 479 1433

mwieczorek@environcorp.com

From: Mike Wieczorek

**Sent:** Thursday, March 19, 2015 10:36 PM

To: 'Layton Willoughby, Kristen'

Cc: Hussain, Munim (Munim.Hussain@mgpingredients.com); 'Graves, Randy' (Randy.Graves@mgpingredients.com)

**Subject:** RE: DRAFT: MGPI SSM 029-35496-00005 / SPM 029-35505-00005

Kristen,

Thanks again for the opportunity to review and provide comments to the draft permit. Please find our comments attached. Comments are included in track changes within the .doc files. Within the spreadsheets comments are indicated by highlighting and/or red font.

I'm available tomorrow until about 2 pm central time if you'd like to discuss in more detail or have any questions, and am available early next week as well.

Regards,

Mike

<image002.jpg>

Michael Wieczorek | Senior Manager

ENVIRON International Corporation
333 W. Wacker Drive | Suite 2700| Chicago, IL 60606
T: +1 312 288 3879 | F: +1 312 288 3801 | M: +1 312 479 1433
mwieczorek@environcorp.com

From: Layton Willoughby, Kristen [mailto:KWilloug@idem.IN.gov]

Sent: Monday, March 09, 2015 10:45 AM

To: Mike Wieczorek

Cc: Hussain, Munim (Munim.Hussain@mgpingredients.com); 'Graves, Randy' (Randy.Graves@mgpingredients.com)

Subject: DRAFT: MGPI SSM 029-35496-00005 / SPM 029-35505-00005

Hello Mike,

Enclosed you will find MGPI's draft permit, potential to emit calculations, and technical support document for review. I have only enclosed the source modification drafts since the permit modification documents are identical to the source modifications documents except for the cover letter. As a courtesy, this draft is being provided to you for an opportunity to look at it and provide comments, prior to the publication of the public notice. This supplemental step of providing you the draft permit does not take away your legal right to provide comments during the 30-day comment period.

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Please pay close attention to the listing of the emission units in Section A, by verifying if these units are specified as they were constructed in your source, and Section D, which specifies applicable requirements to these units. Sections B and C are mostly standard conditions that apply to all Part 70 sources.

Please send a reply email to me immediately confirming that you have received this draft version of the permit for review, and that you are able to access these files in their current format.

As an FIY - I am in a training class most of this week. Therefore, the best way to reach me this week is by email.

Thank you,

Kristen Willoughby

Senior Environmental Manager
100 North Senate Ave.

MC 61-53 IGCN N1003
Indianapolis, IN 46204

Telephone: (317) 233-3031

Fax: (317) 232-6749 kwilloug@idem.IN.gov

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- <35496 TSD.docx>
- <35496 Att A.doc>
- <35496 Att B.docx>
- <35496 Att C.doc>
- <35496 BACT.docx>
- <35496 Calc A.xls>
- <35496 Calc B.xlsx>
- <35496 per.doc>

From: ACKER, JENNY [JLACKER@idem.IN.gov]

**Sent**: 7/3/2014 12:01:15 PM

**To**: Mike Wieczorek [mwieczorek@environcorp.com]

Subject: RE: dryer options

Mike,

Any new dryer constructed (like-for-like or otherwise) would be subject subject to review under 326 IAC 8-1-6 and would a Best Available Control Technology (BACT) analysis would be required if the potential VOC emissions are equal to or greater than twenty-five (25) tons per year.

Jenny

From: Mike Wieczorek [mailto:mwieczorek@environcorp.com]

**Sent:** Monday, June 30, 2014 1:56 PM

**To:** ACKER, JENNY **Cc:** Hussain, Munim

Subject: RE: dryer options

Jenny,

I've been working with Mumin regarding the options MGP is considering for their dryers in Lawrenceburg, IN. I had a follow-up question for you regarding your response below from last week.

If Option 1 (exact replacement) may be evaluated as an existing unit under PSD/EO review, then would it be subject to the state BACT requirement? 326 IAC 8-1-6 states that the BACT requirement applies to "new facilities". I do understand that to be able to use 326 IAC 2-7-10.5(c) for the exact replacement, we'd be required to show that PSD/EO aren't triggered, but it would seem like the state BACT requirement wouldn't apply regardless under option 1 since that option would not involve construction of an entirely new emission unit.

Thanks for your continued assistance.

Regards, Mike



## Michael Wieczorek | Senior Manager

ENVIRON International Corporation
333 W. Wacker Drive | Suite 2700| Chicago, IL 60606
T: +1 312 288 3879 | F: +1 312 288 3801 | M: +1 312 479 1433
mwieczorek@environcorp.com

From: Hussain, Munim [mailto:Munim.Hussain@mgpingredients.com]

**Sent:** Tuesday, June 24, 2014 8:52 AM

To: Mike Wieczorek

Subject: FW: dryer options

FYI. I will contact you later today if you are available.

Regards,

#### Munim Hussain

Corporate Environmental Engineer



MGP Ingredients, Inc. 913.360.5444 (t) | 309.472.7851 (c) | 913.360.5644 (f) mgpingredients.com

From: ACKER, JENNY [mailto:JLACKER@idem.IN.gov]

Sent: Monday, June 23, 2014 11:34 AM

**To:** Hussain, Munim **Cc:** ACKER, JENNY

Subject: RE: dryer options

Munim.

Regards of what option you chose, you will need a Significant Source Modification (SSM) [326 IAC 2-7-10.5]. Options 2 and 3 will require that you wait until the SSM is issued to start construction. If option 1 (exact replacements), meets the requirements of 326 IAC 2-7-10.5(c), you may begin replacement under this provision and are required to submit an application for a SSM not later than thirty (30) days after beginning replacement. To be begin construction prior to issuance of a SSM is at your own risk as the project must remain minor under PSD and EO.

The project will require an evaluation under the requirements of Prevention of Significant Deterioration (PSD) [326 IAC 2-2] and Emission Offset (EO) [326 IAC 2-3]. Under these requirements, option 1 (exact replacement) may be evaluated as an existing unit. Options 2 and 3 are to be treated as new units.

Under all options presented, it appears the 326 IAC 8-1-6 Best Available Control Technology (BACT) will apply.

Please don't hesitate to contact me with any further question or concerns.

Jenny Acker

Section Chief PR3 100 North Senate Ave. MC 61-53 IGCN N1003 Indianapolis, IN 46204 Telephone: (317) 234-5285

Fax: 317.232.6749

From: Hussain, Munim [mailto:Munim.Hussain@mgpingredients.com]

Sent: Tuesday, June 17, 2014 3:40 PM

To: ACKER, JENNY

Subject: FW: dryer options

Good Afternoon Jenny,

As discussed during our teleconference on last Friday (06/13/2014), please see the email below that summarizes the 3 options for dryer/dryers for MGPI of Indiana, Lawrenceburg, IN. Let us know if you have any questions.

Regards,

#### **Munim Hussain**

Corporate Environmental Engineer



MGP Ingredients, Inc. 913.360.5444 (t) | 309.472.7851 (c) | 913.360.5644 (f) mgpingredients.com

From: Working, Gordon

**Sent:** Tuesday, June 17, 2014 1:47 PM

To: Hussain, Munim
Cc: Working, Gordon
Subject: dryer options

Munim... hope this helps... just a quick explanation of each options and how they compare

We are presently looking at 3 options to replace the damaged steam tube dryers in Lawrenceburg, Indiana. 1) The first option is to replace #2 and #5 steam tube dryers with exact replacements of same type and size. 2) The second option is to replace #2 and #5 dryers with a single steam tube dryer able to handle the capacity of #2 and #5. 3) The third option is to replace all the 5 steam tube dryers with a single direct fired rotary dryer. Option 3 would shut down all 5 existing steam tube dryers.

For all 3 options the total net energy input (other than efficiency differences between different types of dryers) for dryers and boilers combined is the same. The steam tube dryers run off steam produced in the boiler. The direct fired boiler uses natural gas directly. The use of natural gas at the direct fired dryer will displace the equivalent use in the boiler as the energy used to run direct fired dryer will be offset by not requiring the steam tubes to operate thus reducing the load on the boiler.

The feed composition and final product composition are the same from both dryer systems

The plant production rate and water removal rates for the two dryer systems are the same.

Overall the use of a direct fired dryer will decrease energy consumption. This is due to elimination of the boiler efficiency (to produce steam to run steam tube dryers) and increased efficiency of the direct fired dryer.

# **Gordon Working**

Corporate Director of Engineering



MGP Ingredients, Inc. 913.360.5466 (t) | 913.908.5053 (m) | mgpingredients.com

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From: Mike Wieczorek [/O=ENVIRONCORP/OU=EXCHANGE ADMINISTRATIVE GROUP

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=MWIECZOREK]

**Sent**: 1/5/2015 3:57:47 PM

To: Layton Willoughby, Kristen [KWilloug@idem.IN.gov]

CC: 'Graves, Randy' (Randy.Graves@mgpingredients.com) [Randy.Graves@mgpingredients.com]

Subject: RE: MGPI of Indiana 029-35276-00005

Attachments: MGPI - Dryer Permit Application\_Final 2014-12-18.docx; MGPI DDG Emission Est\_Final 2014-12-18 IDEM.xlsx

#### Kristen,

Please see attached. If you need any other information please don't hesitate to let Randy and me know.

# Regards, Mike



# Michael Wieczorek | Senior Manager

ENVIRON International Corporation 333 W. Wacker Drive | Suite 2700| Chicago, IL 60606 T: +1 312 288 3879 | F: +1 312 288 3801 | M: +1 312 479 1433 mwieczorek@environcorp.com

From: Layton Willoughby, Kristen [mailto:KWilloug@idem.IN.gov]

**Sent:** Monday, January 05, 2015 8:09 AM

To: Mike Wieczorek

Cc: 'Graves, Randy' (Randy.Graves@mgpingredients.com)

**Subject:** MGPI of Indiana 029-35276-00005

Hello Mike,

My name is Kristen Willoughby and I am the permit writer assigned to MGPI of Indiana's application for a new DDG dryer. In order to expedite the review process, could you please email me the electronic files of the BACT and calculations (preferable in word and excel)?

Thank you,

Kristen Willoughby

Senior Environmental Manager 100 North Senate Ave. MC 61-53 IGCN N1003 Indianapolis, IN 46204 Telephone: (317) 233-3031

Fax: (317) 232-6749 kwilloug@idem.IN.gov

**Sent**: 1/5/2015 4:13:24 PM

**To**: Mike Wieczorek [mwieczorek@environcorp.com]

CC: 'Graves, Randy' (Randy.Graves@mgpingredients.com) [Randy.Graves@mgpingredients.com]

Subject: RE: MGPI of Indiana 029-35276-00005

Thank you. I was able to open both files.

Sincerely,

Kristen Willoughby
Senior Environmental Manager
100 North Senate Ave.
MC 61-53 IGCN N1003
Indianapolis, IN 46204

Telephone: (317) 233-3031 Fax: (317) 232-6749

kwilloug@idem.IN.gov

**From:** Mike Wieczorek [mailto:mwieczorek@environcorp.com]

**Sent:** Monday, January 05, 2015 10:58 AM

To: Layton Willoughby, Kristen

**Cc:** 'Graves, Randy' (Randy.Graves@mgpingredients.com)

Subject: RE: MGPI of Indiana 029-35276-00005

Kristen,

Please see attached. If you need any other information please don't hesitate to let Randy and me know.

# Regards,

Mike



## Michael Wieczorek | Senior Manager

ENVIRON International Corporation 333 W. Wacker Drive | Suite 2700| Chicago, IL 60606 T: +1 312 288 3879 | F: +1 312 288 3801 | M: +1 312 479 1433 mwieczorek@environcorp.com

From: Layton Willoughby, Kristen [mailto:KWilloug@idem.IN.gov]

**Sent:** Monday, January 05, 2015 8:09 AM

To: Mike Wieczorek

Cc: 'Graves, Randy' (Randy.Graves@mgpingredients.com)

**Subject:** MGPI of Indiana 029-35276-00005

Hello Mike,

My name is Kristen Willoughby and I am the permit writer assigned to MGPI of Indiana's application for a new DDG dryer. In order to expedite the review process, could you please email me the electronic files of the BACT and calculations (preferable in word and excel)?

Thank you,

Kristen Willoughby

Senior Environmental Manager
100 North Senate Ave.

MC 61-53 IGCN N1003
Indianapolis, IN 46204
Telephone: (317) 233-3031

Fax: (317) 232-6749 kwilloug@idem.IN.gov

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**Sent**: 1/9/2015 1:07:43 PM

**To**: Mike Wieczorek [mwieczorek@environcorp.com]

CC: 'Graves, Randy' (Randy.Graves@mgpingredients.com) [Randy.Graves@mgpingredients.com]; Hussain, Munim

[Munim.Hussain@mgpingredients.com]; Mikhil Shetty [mshetty@environcorp.com]; Greg Verret

[gverret@environcorp.com]

Subject: RE: MGPI of Indiana SSM 029-35276-00005 / SPM 029-35318-00005

#### Good Morning Mike,

In this case, I am looking for a lb/hr limit. As you can see in the table I sent you, the majority of other sources have both a control efficiency and a lb/hr limit. Top down BACT therefore needs to include a lb/hr. We can talk about this more when you call me. I look forward to speaking with you later.

### Sincerely,

Kristen Willoughby

Senior Environmental Manager 100 North Senate Ave. MC 61-53 IGCN N1003 Indianapolis, IN 46204 Telephone: (317) 233-3031

Fax: (317) 232-6749 kwilloug@idem.IN.gov

From: Mike Wieczorek [mailto:mwieczorek@environcorp.com]

Sent: Thursday, January 08, 2015 6:26 PM

To: Layton Willoughby, Kristen

Cc: 'Graves, Randy' (Randy.Graves@mgpingredients.com); Hussain, Munim; Mikhil Shetty; Greg Verret

**Subject:** RE: MGPI of Indiana SSM 029-35276-00005 / SPM 029-35318-00005

#### Kristen,

I'll give you a call tomorrow to talk through the items to make sure I have a good understanding of the information you require.

Regarding Item 1, in the BACT analysis and the CE-06 application form, we specified achieving a 98% destruction efficiency that would be determined from three 1-hour test runs, followed by continuous temperature monitoring to demonstrate that the 3-hr block average temperature remains at or above the level measured during the source test. Wouldn't the 98% control therefore qualify as a short-term limit?

Thanks,

Mike



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mwieczorek@environcorp.com

From: Layton Willoughby, Kristen [mailto:KWilloug@idem.IN.gov]

Sent: Wednesday, January 07, 2015 3:01 PM

To: Mike Wieczorek

Cc: 'Graves, Randy' (Randy.Graves@mgpingredients.com)

**Subject:** NOD: MGPI of Indiana SSM 029-35276-00005 / SPM 029-35318-00005

Good Afternoon Mike,

I hope you feel better soon.

After reviewing the MGPI application, I have a few questions / need some additional information. Attached is a list of questions I have for you.

Please let me know if you have any questions or need further clarification.

Your written response to this first notice of deficiency (NOD) must be received within thirty (30) days of your receipt of this letter. An e-mail response is adequate.

Pursuant to IC 13-15-4, the accountability time frame will be suspended until the additional information has been received and determined to be adequate.

If you have questions regarding requested information, please call me at 317-233-3031or 1-800-451-6027 (ext 3-3031). Please specify SSM no. 029-35276-00005 and SPM No. 029-35318-00005 on inquiries or correspondence.

Thank you,

Kristen Willoughby
Senior Environmental Manager
100 North Senate Ave.
MC 61-53 IGCN N1003
Indianapolis, IN 46204
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Fax: (317) 232-6749 kwilloug@idem.IN.gov

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From: Mike Wieczorek [/O=ENVIRONCORP/OU=EXCHANGE ADMINISTRATIVE GROUP

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=MWIECZOREK]

**Sent**: 1/8/2015 11:25:33 PM

To: Layton Willoughby, Kristen [KWilloug@idem.IN.gov]

CC: 'Graves, Randy' (Randy.Graves@mgpingredients.com) [Randy.Graves@mgpingredients.com]; Hussain, Munim

[Munim.Hussain@mgpingredients.com]; Mikhil Shetty [mshetty@environcorp.com]; Greg Verret

[gverret@environcorp.com]

**Subject**: RE: MGPI of Indiana SSM 029-35276-00005 / SPM 029-35318-00005

Attachments: MGPI NOD.DOCX

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Sent: Wednesday, January 07, 2015 3:01 PM

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Fax: (317) 232-6749 kwilloug@idem.IN.gov

From: Mike Wieczorek [/O=ENVIRONCORP/OU=EXCHANGE ADMINISTRATIVE GROUP

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=MWIECZOREK]

**Sent**: 2/26/2015 6:32:00 PM

To: Layton Willoughby, Kristen [KWilloug@idem.IN.gov]

CC: Hussain, Munim [Munim.Hussain@mgpingredients.com]; Randy Graves (randy.graves@mgpingredients.com)

[randy.graves@mgpingredients.com]

Subject: RE: MGPI of Indiana SSM 029-35276-00005 / SPM 029-35318-00005 dryer baseline

Kristen,

MGPI would like to remove the requirement for parametric monitoring for EU-12 and EU-34 through EU-36 and retain the requirement for daily visible emission notations.

We're looking into your second question regarding monitoring for the wet scrubbers controlling the existing rotary dryers. I hope to have an answer for your soon.

And thanks for your continued work on the permit.

Regards,

Mike



## Michael Wieczorek | Senior Manager

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From: Layton Willoughby, Kristen [mailto:KWilloug@idem.IN.gov]

**Sent:** Wednesday, February 25, 2015 7:54 AM

To: Mike Wieczorek

Cc: Hussain, Munim; Randy Graves (randy.graves@mgpingredients.com)

Subject: RE: MGPI of Indiana SSM 029-35276-00005 / SPM 029-35318-00005 dryer baseline

Hello Mike,

While working on changes to MGPI's permit I noticed that they had both visible emissions notations and parametric monitoring for EU-12 and EU-34 through EU-36. It is not necessary to have both. Please let me know which one MGPI would like removed.

As part of this modification, I need to put in monitoring for the wet scrubbers controlling the existing rotary dryers (EU-32). Could you please provide the pressure drop range and minimum flow rate (preferably as recommended by the manufacturer, but I know these units are old and that information may not be available)?

Thank you,

Kristen Willoughby
Senior Environmental Manager
100 North Senate Ave.
MC 61-53 IGCN N1003

Indianapolis, IN 46204 Telephone: (317) 233-3031

Fax: (317) 232-6749 kwilloug@idem.IN.gov

From: Mike Wieczorek [mailto:mwieczorek@environcorp.com]

Sent: Friday, February 20, 2015 1:41 PM

To: Layton Willoughby, Kristen

Cc: Hussain, Munim; Randy Graves (<a href="mailto:randy.graves@mgpingredients.com">randy.graves@mgpingredients.com</a>)

**Subject:** RE: MGPI of Indiana SSM 029-35276-00005 / SPM 029-35318-00005 dryer baseline

Kristen,

Here are the sources from Table C-4 for the DDG Cooler and Transport with an explanation for each:

- Hammer Mill: Like you mentioned, this unit is controlled by a cyclone which we've accounted for in determining controlled emission rates.
- Cooling Drum: This unit is downstream of the hammer mill. It's not a true cooler in that it doesn't have a forced air exhaust. But, the drum itself is equipped with a passive vent that is not provided with add-on controls, so we've considered PM emissions to be uncontrolled (thus the table shows the same rates for uncontrolled and controlled emissions).
- Screw conveyor: The conveying into the mill is enclosed, and also equipped with an airlock such that any dust generated would enter the mill and be carried in the vent stream to the cyclone. We didn't assume PM control for conveying, however, largely because the published AP-42 factors for conveyors do not account for control and the emissions were modest.

If you'd like to discuss further please just let me know.

Regards, Mike



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mwieczorek@environcorp.com

From: Layton Willoughby, Kristen [mailto:KWilloug@idem.IN.gov]

Sent: Thursday, February 19, 2015 3:07 PM

To: Mike Wieczorek

Cc: Hussain, Munim; Randy Graves (randy.graves@mgpingredients.com)

Subject: RE: MGPI of Indiana SSM 029-35276-00005 / SPM 029-35318-00005 dryer baseline

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Indianapolis, IN 46204

Telephone: (317) 233-3031 Fax: (317) 232-6749 kwilloug@idem.IN.gov

From: Mike Wieczorek [mailto:mwieczorek@environcorp.com]

Sent: Thursday, February 19, 2015 12:45 PM

To: Layton Willoughby, Kristen

**Cc:** Hussain, Munim; Randy Graves (<a href="mailto:randy.graves@mgpingredients.com">randy.graves@mgpingredients.com</a>)

Subject: RE: MGPI of Indiana SSM 029-35276-00005 / SPM 029-35318-00005 dryer baseline

Kristen,

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**Sent**: 2/25/2015 1:54:08 PM

**To**: Mike Wieczorek [mwieczorek@environcorp.com]

CC: Hussain, Munim [Munim.Hussain@mgpingredients.com]; Randy Graves (randy.graves@mgpingredients.com)

[randy.graves@mgpingredients.com]

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From: Layton Willoughby, Kristen [mailto:KWilloug@idem.IN.gov]

Sent: Thursday, February 19, 2015 3:07 PM

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Cc: Hussain, Munim; Randy Graves (<a href="mailto:randy.graves@mgpingredients.com">randy.graves@mgpingredients.com</a>)

**Subject:** RE: MGPI of Indiana SSM 029-35276-00005 / SPM 029-35318-00005 dryer baseline

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From: Mike Wieczorek [/O=ENVIRONCORP/OU=EXCHANGE ADMINISTRATIVE GROUP

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=MWIECZOREK]

**Sent**: 2/20/2015 6:40:45 PM

To: Layton Willoughby, Kristen [KWilloug@idem.IN.gov]

CC: Hussain, Munim [Munim.Hussain@mgpingredients.com]; Randy Graves (randy.graves@mgpingredients.com)

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**Sent**: 2/19/2015 9:06:58 PM

**To**: Mike Wieczorek [mwieczorek@environcorp.com]

CC: Hussain, Munim [Munim.Hussain@mgpingredients.com]; Randy Graves (randy.graves@mgpingredients.com)

[randy.graves@mgpingredients.com]

**Subject**: RE: MGPI of Indiana SSM 029-35276-00005 / SPM 029-35318-00005 dryer baseline

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From: Mike Wieczorek [/O=ENVIRONCORP/OU=EXCHANGE ADMINISTRATIVE GROUP

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=MWIECZOREK]

**Sent**: 2/19/2015 5:45:05 PM

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CC: Hussain, Munim [Munim.Hussain@mgpingredients.com]; Randy Graves (randy.graves@mgpingredients.com)

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ENVIRON International Corporation
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mwieczorek@environcorp.com

Mike Wieczorek [/O=ENVIRONCORP/OU=EXCHANGE ADMINISTRATIVE GROUP From:

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=MWIECZOREK]

Sent: 3/2/2015 8:58:51 PM

To: Layton Willoughby, Kristen [KWilloug@idem.IN.gov]

CC: Hussain, Munim [Munim.Hussain@mgpingredients.com]; Randy Graves (randy.graves@mgpingredients.com)

[randy.graves@mgpingredients.com]

RE: MGPI of Indiana SSM 029-35276-00005 / SPM 029-35318-00005 dryer baseline Subject:

#### Kristen,

I'm getting back to you regarding your request for pressure drop ranges and minimum flow rates to include as monitoring conditions for the existing wet scrubbers. Below are the values that MGPI proposes:

Parameter	Scrubber #1	Scrubber #2	Scrubber #3	Scrubber #4	Scrubber #5
	S-305	S-306	S-307	S-308	S-309
Normal Pressure Drop	0.5 – 6.5	0.5 – 6.5	0.5 – 6.5	0.5 – 6.5	0.5 – 6.5
Range (inches H20)	0.5 – 6.5	0.3 – 6.3	0.5 – 6.5	0.5 – 6.5	0.5 – 0.5
Scrubber liquor					
minimum flow rate –	4.0	4.0	3.0	3.0	3.0
measured at nozzles	4.0	4.0	3.0	5.0	3.0
(gal/min)					
Scrubber liquor					
minimum flow rate –	10.0	10.0	7.0	7.0	7.0
measured at trays	10.0	10.0	7.0	7.0	7.0
(gal/min)					

Note that the scrubbers each have 2 sources of inlet scrubbing water so we propose to monitor each.

If you have any questions or would like to discuss further please don't hesitate to let us know.

Regards,

Mike



## Michael Wieczorek | Senior Manager

**ENVIRON International Corporation** 333 W. Wacker Drive | Suite 2700| Chicago, IL 60606 T: +1 312 288 3879 | F: +1 312 288 3801 | M: +1 312 479 1433

mwieczorek@environcorp.com

From: Layton Willoughby, Kristen [mailto:KWilloug@idem.IN.gov]

**Sent:** Wednesday, February 25, 2015 7:54 AM

To: Mike Wieczorek

**Cc:** Hussain, Munim; Randy Graves (randy.graves@mgpingredients.com)

Subject: RE: MGPI of Indiana SSM 029-35276-00005 / SPM 029-35318-00005 dryer baseline

Hello Mike,

While working on changes to MGPI's permit I noticed that they had both visible emissions notations and parametric monitoring for EU-12 and EU-34 through EU-36. It is not necessary to have both. Please let me know which one MGPI would like removed.

As part of this modification, I need to put in monitoring for the wet scrubbers controlling the existing rotary dryers (EU-32). Could you please provide the pressure drop range and minimum flow rate (preferably as recommended by the manufacturer, but I know these units are old and that information may not be available)?

Thank you,

Kristen Willoughby
Senior Environmental Manager
100 North Senate Ave.
MC 61-53 IGCN N1003
Indianapolis, IN 46204
Telephone: (317) 233-3031

Fax: (317) 232-6749 kwilloug@idem.IN.gov

From: Mike Wieczorek [mailto:mwieczorek@environcorp.com]

Sent: Friday, February 20, 2015 1:41 PM

To: Layton Willoughby, Kristen

**Cc:** Hussain, Munim; Randy Graves (<a href="mailto:randy.graves@mgpingredients.com">randy.graves@mgpingredients.com</a>)

Subject: RE: MGPI of Indiana SSM 029-35276-00005 / SPM 029-35318-00005 dryer baseline

Kristen,

Here are the sources from Table C-4 for the DDG Cooler and Transport with an explanation for each:

- Hammer Mill: Like you mentioned, this unit is controlled by a cyclone which we've accounted for in determining controlled emission rates.
- Cooling Drum: This unit is downstream of the hammer mill. It's not a true cooler in that it doesn't have a forced air exhaust. But, the drum itself is equipped with a passive vent that is not provided with add-on controls, so we've considered PM emissions to be uncontrolled (thus the table shows the same rates for uncontrolled and controlled emissions).
- Screw conveyor: The conveying into the mill is enclosed, and also equipped with an airlock such that any dust generated would enter the mill and be carried in the vent stream to the cyclone. We didn't assume PM control for conveying, however, largely because the published AP-42 factors for conveyors do not account for control and the emissions were modest.

If you'd like to discuss further please just let me know.

Regards, Mike



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mwieczorek@environcorp.com

From: Layton Willoughby, Kristen [mailto:KWilloug@idem.IN.gov]

Sent: Thursday, February 19, 2015 3:07 PM

To: Mike Wieczorek

Cc: Hussain, Munim; Randy Graves (<a href="mailto:randy.graves@mgpingredients.com">randy.graves@mgpingredients.com</a>)

Subject: RE: MGPI of Indiana SSM 029-35276-00005 / SPM 029-35318-00005 dryer baseline

Mike,

I had a quick clarification question. For the drum cooler and transport system, the controlled emissions are equal to the uncontrolled for everything except the hammer mill. Is the hammer mill the only piece controlled by a cyclone or are all units controlled by a cyclone?

Thank you,

Kristen Willoughby

Senior Environmental Manager 100 North Senate Ave. MC 61-53 IGCN N1003 Indianapolis, IN 46204 Telephone: (317) 233-3031

Fax: (317) 232-6749 kwilloug@idem.IN.gov

From: Mike Wieczorek [mailto:mwieczorek@environcorp.com]

Sent: Thursday, February 19, 2015 12:45 PM

To: Layton Willoughby, Kristen

Cc: Hussain, Munim; Randy Graves (randy.graves@mgpingredients.com)

Subject: RE: MGPI of Indiana SSM 029-35276-00005 / SPM 029-35318-00005 dryer baseline

Kristen,

To follow-up on our phone call, I've confirmed that the 24 month period used for establishing steam tube dryer baseline emissions is January 2013 – December 2014.

In Table D-8, footnote (a) should read the following for clarity:

Feed (wet cake) into existing steam tube dryer system is taken from facility records as the average over the 24-month period from January 2013 - December 2014.

It looks like what happened is that the excel row wasn't tall enough and truncated the text after "facility record" in the pdf I sent yesterday. I apologize for the confusion.

Regards,

Mike



## Michael Wieczorek | Senior Manager

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mwieczorek@environcorp.com

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This message contains information that may be confidential, privileged or otherwise protected by law from disclosure. It is intended for the exclusive use of the Addressee(s). Unless you are the addressee or authorized agent of the addressee, you may not review, copy, distribute or disclose to anyone the message or any information contained within. If you have received this message in error, please contact the sender by electronic reply to email@environcorp.com and immediately delete all copies of the message.

From: Mike Wieczorek [/O=ENVIRONCORP/OU=EXCHANGE ADMINISTRATIVE GROUP

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=MWIECZOREK]

**Sent**: 1/30/2015 11:47:05 PM

**To**: Layton Willoughby, Kristen [KWilloug@idem.IN.gov]

CC: 'Graves, Randy' (Randy.Graves@mgpingredients.com) [Randy.Graves@mgpingredients.com]; Hussain, Munim

[Munim.Hussain@mgpingredients.com]; Gordon.Working@mgpingredients.com; Mikhil Shetty

[mshetty@environcorp.com]

**Subject**: RE: MGPI of Indiana SSM 029-35276-00005 / SPM 029-35318-00005

Attachments: MGPI dryer Process Flow.pdf

Kristin,

Per our discussion earlier today, I'm including answers to a portion of the questions from your Jan 7 notice. I'll be in contact with you next week regarding MGPI's decision on the path forward for the permitting.

- 1. Response is in progress.
- 2. Please provide additional explanation concerning the upstream and downstream processes. If this project will not debottleneck existing processes, please include in this explanation a discussion why there will be no debottlenecking due to this project and how any increase in production / increased utilization after this modification would be due to market demand and could have been accommodated.

Feed to MGPI's dryer operation is generated at the facility's existing stills (EU 20, 25-29). The stills are not being modified as part of the proposed project. Similarly, the existing operations to handle, store, and transfer DDG for off-site shipment, consisting of the DDG conveyors (EU-33) and DDG loadout system (EU-34, EU-35, EU-36, EU-37, and EU-38) will not be modified. The facility's capacity to generate wet cake for drying, and subsequently process the DDG produced, will not change as a result of this project. The existing facility has the ability to produce spirits at a level such that the proposed dryer would operate at capacity, but has not operated at this level in the past due to market demand. Increases in production/increased utilization after the proposed modification will be due to market demand and could have been accommodated.

3. It looks like the DDG goes through the dryer before going to the wet pad based on where the wet cake storage pad is located in the process flow diagram. This doesn't seem correct to me. Please confirm where this is the process flow.

The wet pad is intended for use only during dryer shutdown and startup. Material will first pass through the dryer but not be completely dried due to the start-up/shutdown that is occurring. After passing through the dryer, this material will be conveyed along the incline drag but then be diverted to the wet pad instead of being conveyed on to DDG handling/storage. This diversion to the wet pad will ensure that the wet material is not sent to dry storage.

4. Please explain why is the maximum DDG dryer feed rate given as 7.0 tons/hr in the forms and dryer calculations but given as 17.75 tons/hr for the wet cake calculations?

The 7.0 ton/hr value is the DDG production rate, not the feed rate into the dryer. The 17.75 ton/hr value in Table C-6 is the rate of the feed into the dryer. The difference is due to the water evaporation that occurs

within the dryer. Dryer emission factors are expressed as pounds emitted per ton DDG produced (See Table C-1, C-2, and C-5). Wet pad emission factors are expressed as pounds emitted per ton wet cake processed (See Table C-6).

5. In the application it is stated that the facility is installing a new dryer with the same capacity as the total for the existing dryers. However, the total for the existing dryers is 20 tons per hour while 7 tons per hour is given for the new unit. Is this difference due to the existing dryers giving the amount of grain feed into the system vs. the new unit giving the amount of DDG produced? If this is the case, please confirm that the manufacturer emission factors are based on the amount of DDG produced not the feed to the dryer as is currently indicated in the calculations.

MGPI has confirmed with the vendor that the emission factors for the proposed dryer are based on the amount of DDG produced and not the feed to the dryer. Response regarding throughput rates is still in progress.

6. Are the new conveyors and mixer / inlet screw emissions included in the PTE for the new dryer? There were no calculations for these units so I was unsure if the vendor emission factor included all the new conveyors (both going to and from the dryer) and mixer / inlet screw.

The new conveyors and mixer/inlet screw emissions are included in the PTE for the new dryer. Attached is a flow diagram of the proposed dryer providing additional detail on the conveyors upstream and downstream of the dryer drum. Each transfer points is listed in the tables below, and as can be seen, each is fully enclosed. Particulate generated as material is conveyed to the dryer would remain in the enclosed conveyors and ultimately be emitted at the dryer itself. Particulate generated as material is conveyed from the dryer would remain in the enclosed conveyors and ultimately be emitted at the existing screw conveyor/hammer mill/drum cooler downstream (application Table C-5).

Inlet to Dryer		
Drawing Ref	Description	Is equipment or drop/transfer point fully enclosed?
1	Drop/Transfer Point: Screw #1 K-Valve to Feed Conveyor #11	Yes
2	Feed Conveyor #11	Yes
3	Drop/Transfer Point: Conveyor #11 to #12	Yes
4	Feed Conveyor #12	Yes
5	Drop/Transfer Point: Conveyor #12 to #13	Yes
6	Feed Conveyor #13	Yes
7	Drop/Transfer Point: Wet feed from Feed Conveyor #13 to Agitator Mixer	Yes
8	Drop/Transfer Point: Recycle DDG from Recycle Screw to Agitator Mixer	Yes
9	Drop/Transfer Point: Syrup from evaporator to Agitator Mixer	Yes
10	Agitator Mixer	Yes
11	Drop/Transfer Point:	Yes

	Agitator Mixer to Inlet Screw		
12	Inlet Screw	Yes	
13	Drop/Transfer Point:	Yes	
	Inlet Screw to Dryer Drum		

Outlet From D	·	
Drawing Ref	Description	Is equipment or drop/transfer
		point fully enclosed?
14	Drop/Transfer Point:	Yes
	Dryer Drum to Drop Box Screw	163
15	Drop Box Screw	Yes
	Drop/Transfer Point:	Yes
	Drop Box Screw to Incline Drag	103
17	Drop/Transfer Point:	Yes
	Cyclones to Cyclone Screws	163
18	Cyclone Screws	Yes
1	Drop/Transfer Point:	
	Cyclone Screws to Incline Drag	Yes
20	Incline Drag	Yes
	Drop/Transfer Point:	Yes
	Incline Drag to Recycle Screw	les
22	Recycle Screw	Yes
ı	Drop/Transfer Point:	Yes
	Incline Drag to K-Valve	res
24	K-Valve	Yes
25	Drop/Transfer Point: Yes	
	K-Valve to Product Conveyor #21	res
26	Product Conveyor #21	Yes
27	Drop/Transfer Point: Product Conveyor #21 to #22  Yes	
28	Product Conveyor #22	Yes
29	Drop/Transfer Point:	Voc
	Product Conveyor #22 to #23	Yes
30	Product Conveyor #23	Yes
31	Drop/Transfer Point:	W
	Product Conveyor #23 to Existing Screw Conveyor	Yes

7. Could you please explain how the mixer / inlet screw fits into the process and what occurs here?

Wet distillers grain from the feed conveyors (#11, #12, and #13) will drop into a dual shaft agitator mixer. The mixer will blend the wet distillers grain with syrup (from existing stillage processing operations) and with recycled product from the direct-fired dryer. The mixer will convey the resulting product to the inlet screw, and then the inlet screw will convey this material into the rotary drum of the proposed dryer. Attached is a flow diagram of the proposed dryer providing additional detail on the mixer / inlet screw. The mixer/inlet screw transfer points are also listed in the Table above.

8. Could you please explain how the recycle feed moves from the incline drag conveyor to the mixer / inlet screw?

Dried product is conveyed along the incline drag. A portion of this material drops into the recycle screw, where it is then conveyed to and dropped into the dual shaft agitator mixer. Attached is a flow diagram of the proposed dryer providing additional detail on the recycle feed. The recycle transfer points are also listed in the Table above.

9. Response is in progress.

Regards, Mike



# Michael Wieczorek | Senior Manager

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mwieczorek@environcorp.com

From: Layton Willoughby, Kristen [mailto:KWilloug@idem.IN.gov]

Sent: Wednesday, January 07, 2015 3:01 PM

To: Mike Wieczorek

Cc: 'Graves, Randy' (Randy.Graves@mgpingredients.com)

**Subject:** NOD: MGPI of Indiana SSM 029-35276-00005 / SPM 029-35318-00005

Good Afternoon Mike,

I hope you feel better soon.

After reviewing the MGPI application, I have a few questions / need some additional information. Attached is a list of questions I have for you.

Please let me know if you have any questions or need further clarification.

Your written response to this first notice of deficiency (NOD) must be received within thirty (30) days of your receipt of this letter. An e-mail response is adequate.

Pursuant to IC 13-15-4, the accountability time frame will be suspended until the additional information has been received and determined to be adequate.

If you have questions regarding requested information, please call me at 317-233-3031or 1-800-451-6027 (ext 3-3031). Please specify SSM no. 029-35276-00005 and SPM No. 029-35318-00005 on inquiries or correspondence.

Thank you,

Kristen Willoughby

Senior Environmental Manager
100 North Senate Ave.

MC 61-53 IGCN N1003
Indianapolis, IN 46204

Telephone: (317) 233-3031 Fax: (317) 232-6749

kwilloug@idem.IN.gov

From: Hussain, Munim

**Sent:** Wednesday, June 25, 2014 11:06 AM

To: 'ACKER, JENNY'
Subject: RE: dryer options

Jenny,

We need further clarification regarding the in kind replacement (option 1) of the dryers.

By in kind replacement, we mean that the exact same dryers will replace the two damaged dryers and the exhausts will go through the same scrubbers used before and no additional control equipment will be used. Could you please explain what you meant by 'the project must remain minor under PSD and EO'? You also mentioned that BACT would apply for in kind replacement as well. Will we be losing the grandfather status for those two damaged dryers if we replace them with the same exact dryers?

I would appreciate if you could let us know IDEM's policy in this regard.

Thanks,

#### **Munim Hussain**

Corporate Environmental Engineer



MGP Ingredients, Inc. 913.360.5444 (t) | 309.472.7851 (c) | 913.360.5644 (f) mapingredients.com

From: ACKER, JENNY [mailto:JLACKER@idem.IN.gov]

**Sent:** Monday, June 23, 2014 11:34 AM

**To:** Hussain, Munim **Cc:** ACKER, JENNY

Subject: RE: dryer options

Munim,

Regards of what option you chose, you will need a Significant Source Modification (SSM) [326 IAC 2-7-10.5]. Options 2 and 3 will require that you wait until the SSM is issued to start construction. If option 1 (exact replacements), meets the requirements of 326 IAC 2-7-10.5(c), you may begin replacement under this provision and are required to submit an application for a SSM not later than thirty (30) days after beginning replacement. To be begin construction prior to issuance of a SSM is at your own risk as the project must remain minor under PSD and EO.

The project will require an evaluation under the requirements of Prevention of Significant Deterioration (PSD) [326 IAC 2-2] and Emission Offset (EO) [326 IAC 2-3]. Under these requirements, option 1 (exact replacement) may be evaluated as an existing unit. Options 2 and 3 are to be treated as new units.

Under all options presented, it appears the 326 IAC 8-1-6 Best Available Control Technology (BACT) will apply.

Please don't hesitate to contact me with any further question or concerns.

### Jenny Acker

Section Chief PR3 100 North Senate Ave. MC 61-53 IGCN N1003 Indianapolis, IN 46204

Telephone: (317) 234-5285

Fax: 317.232.6749

From: Hussain, Munim [mailto:Munim.Hussain@mgpingredients.com]

**Sent:** Tuesday, June 17, 2014 3:40 PM

To: ACKER, JENNY

Subject: FW: dryer options

Good Afternoon Jenny,

As discussed during our teleconference on last Friday (06/13/2014), please see the email below that summarizes the 3 options for dryer/dryers for MGPI of Indiana, Lawrenceburg, IN. Let us know if you have any questions.

Regards,

### **Munim Hussain**

Corporate Environmental Engineer



MGP Ingredients, Inc. 913.360.5444 (t) | 309.472.7851 (c) | 913.360.5644 (f) mgpingredients.com

From: Working, Gordon

**Sent:** Tuesday, June 17, 2014 1:47 PM

**To:** Hussain, Munim **Cc:** Working, Gordon **Subject:** dryer options

Munim... hope this helps... just a quick explanation of each options and how they compare

We are presently looking at 3 options to replace the damaged steam tube dryers in Lawrenceburg, Indiana. 1) The first option is to replace #2 and #5 steam tube dryers with exact replacements of same type and size. 2) The second option is to replace #2 and #5 dryers with a single steam tube dryer able to handle the capacity of #2 and #5. 3) The third option is to replace all the 5 steam tube dryers with a single direct fired rotary dryer. Option 3 would shut down all 5 existing steam tube dryers.

For all 3 options the total net energy input (other than efficiency differences between different types of dryers) for dryers and boilers combined is the same. The steam tube dryers run off steam produced in the boiler. The direct fired boiler uses natural gas directly. The use of natural gas at the direct fired dryer will displace the equivalent use in the boiler as the energy used to run direct fired dryer will be offset by not requiring the steam tubes to operate thus reducing the load on the boiler.

The feed composition and final product composition are the same from both dryer systems

2

The plant production rate and water removal rates for the two dryer systems are the same.

Overall the use of a direct fired dryer will decrease energy consumption. This is due to elimination of the boiler efficiency (to produce steam to run steam tube dryers) and increased efficiency of the direct fired dryer.

# **Gordon Working**

Corporate Director of Engineering



MGP Ingredients, Inc. 913.360.5466 (t) | 913.908.5053 (m) | mgpingredients.com

From: ACKER, JENNY < JLACKER@idem.IN.gov>

**Sent:** Monday, June 23, 2014 11:34 AM

To: Hussain, Munim
Cc: ACKER, JENNY
Subject: RE: dryer options

#### Munim,

Regards of what option you chose, you will need a Significant Source Modification (SSM) [326 IAC 2-7-10.5]. Options 2 and 3 will require that you wait until the SSM is issued to start construction. If option 1 (exact replacements), meets the requirements of 326 IAC 2-7-10.5(c), you may begin replacement under this provision and are required to submit an application for a SSM not later than thirty (30) days after beginning replacement. To be begin construction prior to issuance of a SSM is at your own risk as the project must remain minor under PSD and EO.

The project will require an evaluation under the requirements of Prevention of Significant Deterioration (PSD) [326 IAC 2-2] and Emission Offset (EO) [326 IAC 2-3]. Under these requirements, option 1 (exact replacement) may be evaluated as an existing unit. Options 2 and 3 are to be treated as new units.

Under all options presented, it appears the 326 IAC 8-1-6 Best Available Control Technology (BACT) will apply.

Please don't hesitate to contact me with any further question or concerns.

Jenny Acker

Section Chief PR3 100 North Senate Ave. MC 61-53 IGCN N1003 Indianapolis, IN 46204 Telephone: (317) 234-5285

Fax: 317.232.6749

From: Hussain, Munim [mailto:Munim.Hussain@mgpingredients.com]

Sent: Tuesday, June 17, 2014 3:40 PM

To: ACKER, JENNY

Subject: FW: dryer options

Good Afternoon Jenny,

As discussed during our teleconference on last Friday (06/13/2014), please see the email below that summarizes the 3 options for dryer/dryers for MGPI of Indiana, Lawrenceburg, IN. Let us know if you have any questions.

Regards,

## **Munim Hussain**

Corporate Environmental Engineer

From: Working, Gordon

**Sent:** Tuesday, June 17, 2014 1:47 PM

**To:** Hussain, Munim **Cc:** Working, Gordon **Subject:** dryer options

Munim... hope this helps... just a quick explanation of each options and how they compare

We are presently looking at 3 options to replace the damaged steam tube dryers in Lawrenceburg, Indiana. 1) The first option is to replace #2 and #5 steam tube dryers with exact replacements of same type and size. 2) The second option is to replace #2 and #5 dryers with a single steam tube dryer able to handle the capacity of #2 and #5. 3) The third option is to replace all the 5 steam tube dryers with a single direct fired rotary dryer. Option 3 would shut down all 5 existing steam tube dryers.

For all 3 options the total net energy input (other than efficiency differences between different types of dryers) for dryers and boilers combined is the same. The steam tube dryers run off steam produced in the boiler. The direct fired boiler uses natural gas directly. The use of natural gas at the direct fired dryer will displace the equivalent use in the boiler as the energy used to run direct fired dryer will be offset by not requiring the steam tubes to operate thus reducing the load on the boiler.

The feed composition and final product composition are the same from both dryer systems

The plant production rate and water removal rates for the two dryer systems are the same.

Overall the use of a direct fired dryer will decrease energy consumption. This is due to elimination of the boiler efficiency (to produce steam to run steam tube dryers) and increased efficiency of the direct fired dryer.

#### Gordon Working

Corporate Director of Engineering



MGP Ingredients, Inc.

913.360.5466 (t) | 913.908.5053 (m) | mgpingredients.com

From: Hussain, Munim

**Sent:** Friday, June 13, 2014 8:37 AM

To: 'jlacker@idem.in.gov'

Subject: RE: Conference call on this Friday at 11 am (Indiana Time)

Jenny,

As discussed, please call us at 913-360-5245 at 11 AM (Indiana Time).

Regards,

#### **Munim Hussain**

Corporate Environmental Engineer



MGP Ingredients, Inc. 913.360.5444 (t) | 309.472.7851 (c) | 913.360.5644 (f) mgpingredients.com

From: Hussain, Munim

Sent: Wednesday, June 11, 2014 2:21 PM

To: 'jlacker@idem.in.gov'

Subject: Conference call on this Friday at 11 am (Indiana Time)

Hello Jenny,

It was nice talking to you in this afternoon. I really appreciate your time. As discussed, we will have a conference call on this Friday (06/13/14) at 11 AM (Indiana Time). We will be discussing different options for a new DDGS dryer/dryers. Please note that there will not be any changes in dryers operating capacities. Let me know if you have any questions.

Regards,

## **Munim Hussain**

Corporate Environmental Engineer



MGP Ingredients, Inc. 913.360.5444 (t) | 309.472.7851 (c) | 913.360.5644 (f) mgpingredients.com

From: Hussain, Munim

Sent: Wednesday, June 11, 2014 2:21 PM

'jlacker@idem.in.gov' To:

Subject: Conference call on this Friday at 11 am (Indiana Time)

Hello Jenny,

It was nice talking to you in this afternoon. I really appreciate your time. As discussed, we will have a conference call on this Friday (06/13/14) at 11 AM (Indiana Time). We will be discussing different options for a new DDGS dryer/dryers. Please note that there will not be any changes in dryers operating capacities. Let me know if you have any questions.

Regards,

# **Munim Hussain**

Corporate Environmental Engineer



MGP Ingredients, Inc. 913.360.5444 (t) | 309.472.7851 (c) | 913.360.5644 (f) mgpingredients.com

From: Hussain, Munim

Sent: Thursday, March 06, 2014 1:08 PM

To: 'Krawczyk, Jason'
Cc: 'jlacker@idem.in.gov'

Subject: RE: New Dryer Permit Issue

Mr. Krawczyk,

Thank you very much for your reply. I will be communicating with Jenny Acker as needed.

Regards,

## **Munim Hussain**

Corporate Environmental Engineer



MGP Ingredients, Inc. 913.360.5444 (t) | 309.472.7851 (c) | 913.360.5644 (f) mgpingredients.com

From: Krawczyk, Jason [mailto:JKrawczyk@idem.IN.gov]

**Sent:** Thursday, March 06, 2014 12:10 PM

To: Hussain, Munim

Subject: RE: New Dryer Permit Issue

Mr. Hussain.

I have forwarded your e-mail inquiry to Jenny Acker, the Section Chief whose section the MGPI application resides and who could better address your questions and concerns. Jenny's contact information is:

#### jlacker@idem.in.gov

317/234-5285

Respectfully,

#### Jason R. Krawczyk

Section Chief

Permits Branch, Office of Air Quality

Indiana Department of Environmental Management

Direct Phone: 317-234-5174

Fax: 317-232-6749

Email: JKrawczyk@idem.in.gov

From: Hussain, Munim [mailto:Munim.Hussain@mgpingredients.com]

Sent: Wednesday, March 05, 2014 5:01 PM

To: Krawczyk, Jason

Subject: New Dryer Permit Issue

Good Afternoon Jason,

I talked to you last week regarding the permitting issue of a direct fired dryer for our plant in Lawrenceburg, IN. The current operating permit ID for this plant is T029-24407-00005. Could you please let know your inputs for the following questions?

- 1. What permitting would be required for a direct fired dryer? How long a time frame is required?
- 2. With Lawrenceburg being a non-containment area... can a direct fired dryer be permitted at all?
- 3. As a distillery we are exempt from some emissions control that a fuel alcohol plant would require... at Lawrenceburg is a thermal oxidizer required for a direct fired dryer?
- 4. Are there other permits required for Lawrenceburg with any process changes?
- 5. Could the existing boiler stack be used for a combined stack with the dryer?

Sincerely,

## **Munim Hussain**

Corporate Environmental Engineer



MGP Ingredients, Inc. 100 Commercial Street, Atchison, KS 66002 913.360.5444 (t) | 309.472.7851 (c) | 913.360.5644 (f) mgpingredients.com

**Sent**: 3/9/2015 3:45:11 PM

**To**: Mike Wieczorek [mwieczorek@environcorp.com]

CC: Hussain, Munim (Munim.Hussain@mgpingredients.com) [Munim.Hussain@mgpingredients.com]; 'Graves, Randy'

(Randy.Graves@mgpingredients.com) [Randy.Graves@mgpingredients.com]

Subject: DRAFT: MGPI SSM 029-35496-00005 / SPM 029-35505-00005

Attachments: 35496 Att A.doc; 35496 Att B.docx; 35496 Att C.doc; 35496 BACT.docx; 35496 Calc A.xls; 35496 Calc B.xlsx; 35496

per.doc; 35496 TSD.docx

#### Hello Mike,

Enclosed you will find MGPI's draft permit, potential to emit calculations, and technical support document for review. I have only enclosed the source modification drafts since the permit modification documents are identical to the source modifications documents except for the cover letter. As a courtesy, this draft is being provided to you for an opportunity to look at it and provide comments, prior to the publication of the public notice. This supplemental step of providing you the draft permit does not take away your legal right to provide comments during the 30-day comment period.

The time clock for SSM No. 029-35496-00005 and SPM No. 029-35505-00005 will be stopped during your review until you either provide comments or indicate that you do not have any comments. Due to permit accountability and the intention to public notice your permit in a timely manner; you are being allotted two (2) weeks to provide comments in writing. During this review, I will be available to address your concerns and answer any questions that you may have, or to make necessary revisions to this draft. If you have any conflicts or special circumstances that would impede your review process during the time allotted, please notify me directly at the email address or phone number listed below as soon as possible. If you have not responded by the date of Monday, March 23, 2015, IDEM will assume that you have no comments pertaining to this draft and all files will be forwarded for public notice.

Please pay close attention to the listing of the emission units in Section A, by verifying if these units are specified as they were constructed in your source, and Section D, which specifies applicable requirements to these units. Sections B and C are mostly standard conditions that apply to all Part 70 sources.

Please send a reply email to me immediately confirming that you have received this draft version of the permit for review, and that you are able to access these files in their current format.

As an FIY - I am in a training class most of this week. Therefore, the best way to reach me this week is by email.

Thank you, Kristen Willoughby

Senior Environmental Manager 100 North Senate Ave. MC 61-53 IGCN N1003 Indianapolis, IN 46204 Telephone: (317) 233-3031

Fax: (317) 232-6749 kwilloug@idem.IN.gov

**Sent**: 1/5/2015 2:09:29 PM

**To**: Mike Wieczorek [mwieczorek@environcorp.com]

CC: 'Graves, Randy' (Randy.Graves@mgpingredients.com) [Randy.Graves@mgpingredients.com]

Subject: MGPI of Indiana 029-35276-00005

#### Hello Mike,

My name is Kristen Willoughby and I am the permit writer assigned to MGPI of Indiana's application for a new DDG dryer. In order to expedite the review process, could you please email me the electronic files of the BACT and calculations (preferable in word and excel)?

Thank you,

Kristen Willoughby Senior Environmental Manager 100 North Senate Ave. MC 61-53 IGCN N1003 Indianapolis, IN 46204

Fax: (317) 232-6749 kwilloug@idem.IN.gov

Telephone: (317) 233-3031

**Sent**: 6/23/2014 11:53:08 AM

**To**: Graves, Randy [Randy.Graves@mgpingredients.com]

CC: Mike Wieczorek [mwieczorek@environcorp.com]; Templin, Mike [Mike.Templin@mgpingredients.com]; Hussain,

Munim [Munim.Hussain@mgpingredients.com]; Rindom, Dave [Dave.Rindom@mgpingredients.com]

**Subject**: Permit 029-32119-00005

Attachments: 32119TSD.doc; 32119 ATSD.docx; 32119 ATSD ca.xlsx; 32119Attachment A.doc; 32119Attachment B.doc;

32119Attachment C.doc; 32119ca.xls; 32119per.doc

Hello Mr. Graves,

IDEM did not receive any comments from the EPA on MGPI's renewal permit. The permit has been issued. Attached are copies of the electronic files. A hard copy has been mailed. Please let me know if you have any questions.

Thank you,

Kristen Willoughby

Senior Environmental Manager 100 North Senate Ave. MC 61-53 IGCN N1003 Indianapolis, IN 46204 Telephone: (317) 233-3031

Fax: (317) 232-6749 kwilloug@idem.IN.gov